

1 Do you see that?

2 A. Yes.

3 Q. Grievance Response Step 1..

4 A. Yes.

5 Q. Do you know what those things mean?

6 A. They're in the Employee Handbook, I believe. But
7 I filled this out as a standard grievance, they sent it back
8 to me as an Informal Step 1. I don't know. It should be
9 marked Standard, I filled it out as a Standard. I don't
10 know why they would have marked an Informal or why they put
11 it Step 1. I never seen Step 2 or 3.

12 Q. You got this document back and that was the end of
13 it.

14 A. That was the end of it. Never heard nothing more.

15 Q. Did you ask for any more forms to fill out?

16 A. There wasn't anything else.

17 Q. What do you mean?

18 A. I asked what was going to happen with this, and I
19 was never given any response. They said it would be private
20 concerns of the prison, that was about it.

21 Q. You're now referring to the handwriting here,
22 right?

23 A. Yes.

24 Q. Did you discuss the subject with Deputy Sabousky?

25 A. Yes.

1 Q. And what did he say?

2 A. I was blown off. I wasn't given any type of
3 response. Just that they would take care of it, and that
4 was it. It was no longer my concern.

5 Q. Did you ask for an appeal form?

6 A. There is no appeal form to it.

7 Q. What do you mean, there's no appeal?

8 A. That's it. When you get your inmate grievance
9 response, that's the last procedure that you can follow is a
10 grievance. Like I said, they're very difficult to get. I
11 was fortunate enough to get the one I did. And once I got
12 the response, that was it. That was the end of it. There
13 wasn't any more.

14 Q. Would you go to Page 17 of the Inmate Handbook,
15 please.

16 A. (Witness complies.) Yes.

17 Q. Okay. Do you see the heading toward the top of
18 the page, Inmate Grievance Procedure?

19 A. Uh-huh.

20 Q. Okay. Under the heading, Procedures, it says, "An
21 inmate may file a grievance at any time to bring a problem
22 to the staff's attention or to appeal a specific action such
23 as a disciplinary sanction," right?

24 A. Yes.

25 Q. And that's what you did, you filed a grievance,

1 right?

2 A. That's correct.

3 Q. Okay. And then Grievances Classifications, it
4 says, "Grievances will be classified as either an informal,
5 standard, or emergency grievance." And I think you said you
6 classified yours as standard.

7 A. That's correct.

8 Q. If you look at Exhibit M, that's what you checked
9 you did. You checked the box standard, right?

10 A. That's correct.

11 Q. But it came back to you with -- the grievance
12 response came back checked informal.

13 A. That's correct. And it's not correct that they
14 had sent back to me Informal because an Informal is just a
15 verbal expression of what happened. A standard is where you
16 put it down on paper.

17 Q. Okay.

18 A. To my knowledge, I mean, that's how I think it
19 goes.

20 Q. Going down to -- see the word "standard" down
21 there, there are grievance classifications.

22 A. Yes.

23 Q. Let me read that to you.

24 A. Okay.

25 Q. "At any time within five days after a potentially

1 grievable event has occurred, an inmate may file a formal
2 written grievance," and that's what you did.

3 A. That's correct.

4 Q. "The inmate will be provided with a grievance form
5 by a staff member." And that was done, right?

6 A. That's correct.

7 Q. "The staff member will instruct the inmate on the
8 basic requirements for completing the form if the inmate so
9 requests." Did that happen? Did you ask somebody, how do I
10 fill this out and did they tell you?

11 A. No.

12 Q. "The staff member will accept the written and
13 completed form from the inmate and forward it to the Officer
14 in Charge, who may then attempt an informal resolution." No
15 one attempted an informal resolution with you, right?

16 A. No.

17 Q. "However, if not resolved informally within 48
18 hours, the Officer in Charge will refer the issue to the
19 Deputy Warden of Treatment for review of prison policies and
20 procedures to determine if any had been violated." Is
21 Deputy Warden Sabousky the Deputy Warden of Treatment?

22 A. He's the Deputy Warden, I don't know "of
23 treatment." I've never heard that title used on anybody in
24 that prison.

25 Q. Okay.

1 A. But I'm going to say I would assume that he took
2 that role.

3 Q. You don't know, though?

4 A. But I don't know. He is Deputy Warden.

5 Q. At that time, the Warden was Ronald Snyder?

6 A. That's correct.

7 Q. And there was Chief Deputy Lyles.

8 A. Correct.

9 Q. And Deputy Sabousky.

10 A. Correct.

11 Q. Have we got all the big wigs now?

12 A. That's it.

13 Q. It goes on to say, "The Deputy Warden of Treatment
14 may seek to remedy the grievance within seven days through
15 an informal resolution in which both parties agree,
16 verbally, on a remedy or through a formal resolution in
17 which all remedies and dispositions are proposed in written
18 form with copies to the inmate, inmate's file, and Warden.
19 The record of the final, written, formal resolution will be
20 returned to the inmate within 30 days of receipt."

21 So there was no informal resolution of any kind,
22 right?

23 A. They took the formal route, and that's what I
24 received within 30 days, and that's it.

25 Q. I got you. If you move down the page, though, it

1 says, Grievance Committee. "In the event a grievance cannot
2 be resolved to the inmate's satisfaction by the Deputy
3 Warden of Treatment within seven days, a grievance committee
4 will be convened to resolve the issue." Was a grievance
5 committee ever convened here?

6 A. Never heard of a grievance committee. Never had
7 the handbook to know you could even go to one.

8 Q. So you didn't ask for one because you didn't know
9 about it?

10 A. I didn't know about it, and I've never heard of
11 one.

12 Q. And nobody told you about it back then.

13 A. Absolutely not.

14 Q. And then further down the page it says, Appeals of
15 Grievance Committee Decisions. "Inmates who are
16 dissatisfied with the resolution of the grievance by the
17 grievance committee will have five working days after
18 receipt of the notice of decision to appeal to the prison
19 warden."

20 You didn't appeal to the prison warden and I would
21 imagine you didn't know that you could.

22 A. Had no idea.

23 Q. Because you didn't have the manual and nobody told
24 you about that.

25 A. That's correct.

1 Q. Is this the only grievance that you ever filed
2 when you were at Venango County Prison?

3 A. This incarceration? Yes.

4 Q. During this incarceration?

5 A. Yes.

6 Q. The other one, you had filed some?

7 A. I had filed some in the past, but nothing that was
8 this serious in nature.

9 Q. After you got the decision back from Deputy
10 Sabousky -- you may have told me this already and I have
11 forgotten it -- how was it delivered to you?

12 A. I believe that he called me in his office. I
13 can't remember.

14 Q. Sabousky?

15 A. I believe -- it was delivered to me by Sabousky.

16 Q. And he handed it to you?

17 A. Yes.

18 Q. And did you have a conversation with him about it?

19 A. Yes.

20 Q. What did he say and what did you say?

21 A. I don't recall. I know I wasn't happy with the
22 outcome.

23 Q. Did he tell you that you had a right to appeal
24 that decision to a grievance committee?

25 A. No.

1 Q. Did he tell you that you had the right to appeal
2 the decision of the grievance committee to the warden?

3 A. No.

4 Q. Did anybody ever tell you that you had those
5 rights?

6 A. No.

7 Q. I guess, before this deposition?

8 A. No.

9 Q. I'm kind of telling you that right now; aren't I?

10 A. Yes.

11 Q. So in your mind, you thought when you got that
12 decision from Deputy Warden Sabousky that was the end of the
13 trail for the grievance procedure?

14 A. I assumed that with what was written that it would
15 be internally taken care of, that nothing would be done, and
16 that was the end of it.

17 Q. And you were completely unaware of any right to
18 appeal that further?

19 A. Completely unaware. It says right in that
20 grievance that it will be the private concerns of the
21 prison. So I assumed that whatever they did from there on
22 out had nothing to do with me.

23 Q. Okay. Where is Sheila Kizer now; if you know?

24 A. No idea.

25 Q. You knew her when you were in jail with her, but

1 that was it.

2 A. That is it. She was just another inmate. She was
3 originally from California.

4 Q. Going back to your Complaint in this case for a
5 moment -- I'm almost done -- that's Exhibit A, you indicate
6 on Page 4 of that document -- I'll just read it to you. If
7 you want to check me, be my guest. "I was assaulted by
8 Correctional Officer Keokee Craft as a result of my housing
9 and to what procedures to follow."

10 What do you mean as a result of your housing?

11 A. I believe if I was never placed in a Holding cell
12 that there wouldn't have been confusion as to what
13 procedures to follow and that the issue of the handcuffs
14 would have never arose.

15 Q. And the assault that you describe here in this
16 document is -- relates to the conduct of Officer Craft in
17 the elevator the second time -- I guess there wasn't a first
18 time. The first time. And then on the way back from the
19 elevator to your cell until you got in your cell, right?

20 A. Yes.

21 Q. The grabbing the handcuffs in the elevator and
22 pushing you to the ground by your shoulders and I guess
23 yanking you around in there, too, by the handcuffs, right?

24 A. Correct.

25 Q. And walking down the hall pinching your arm,

1 right?

2 A. Correct.

3 Q. And shoving you down the hall, right?

4 A. Correct.

5 Q. And then when you got near your cell and the
6 receiving area and you moved your arm away to get out of her
7 grasp, because she was pinching you, she pushed you against
8 the receiving desk. That's also the assault you're talking
9 about, right?

10 A. Yes.

11 Q. Have I covered it all now?

12 A. Yes.

13 Q. All right. So you saw Dr. Beals on the 16th of
14 May, right?

15 A. Correct.

16 Q. What did -- Dr. Beals x-rayed you; didn't he?

17 A. I think there may have been an x-ray technician
18 and there was no breakage.

19 Q. They were x-raying for a fracture; is that it?

20 A. That's correct.

21 Q. And there wasn't any?

22 A. There wasn't any.

23 Q. Did Dr. Beals give you any -- did he put a splint
24 on anything, or did he give you any medication, or anything
25 like that?

1 A. No.

2 Q. Did he tell you to conduct yourself in some way to
3 avoid further injury?

4 A. No.

5 Q. He examined you, observed the bruising, took an
6 x-ray looking for fractures, and didn't give you any
7 medication or any device to put on it.

8 A. No, not at that time. They didn't know if
9 anything was wrong with me or not. And it was told to me by
10 the prison just to take Motrin and -- or Tylenol, is all
11 they have.

12 Q. Over the counter.

13 A. Yeah, whenever I need it. And that I just had
14 muscle contusions. So I wasn't given an immediate result
15 right there at that office. So if there was anything wrong,
16 I wouldn't have known because it came from Venango County
17 Prison.

18 Q. Did you take any medication, any over-the-counter
19 medication?

20 A. I think I may have taken Tylenol.

21 Q. I thought I saw something about ice, too. Did
22 they give you some ice or something?

23 A. Yeah. That was referred to me by the on-call
24 doctor. That was after the immediate incident. It wasn't
25 when I had gone to the doctor myself.

1 Q. Did you apply ice to it?

2 A. I don't recall.

3 Q. Did you have an inability to move your wrist for a
4 while after the incident?

5 A. Right away, I did.

6 Q. Did you still have that inability by the time you
7 saw the doctor on May 16th?

8 A. No.

9 Q. So what's right away? What period of time are you
10 talking about?

11 A. Like immediately afterward my arms were stiffened
12 up, and they hurt real bad to bend because of the handcuffs.
13 The handcuffs weren't taken off of me immediately.

14 Q. Okay. That's right. I need to cover that with
15 you. Officer Craft threw you against the receiving desk,
16 held you down with her body, and someone else opened the
17 door.

18 A. That's correct.

19 Q. And once that door was opened, did Officer Craft,
20 then, place you in your cell?

21 A. Yes.

22 Q. Was Sheila Kizer in the cell at that time?

23 A. Yes.

24 Q. And after she placed you in your cell, was the
25 cell door locked?

1 A. Yes.

2 Q. And your handcuffs were not removed before the
3 door was locked.

4 A. That's correct.

5 Q. Did you have a conversation with Officer Craft
6 about that?

7 A. Yes.

8 Q. Tell me about that.

9 A. I said, are you going to take my handcuffs off and
10 she said she would take them off when she felt like it. And
11 she left to go continue visitation with the other inmates.

12 Q. And you were left with a locked door and with your
13 cuffs on?

14 A. And with another inmate in the cell with me, yes.

15 Q. At some point did someone take the cuffs off?

16 A. Yes.

17 Q. When?

18 A. Not long afterwards.

19 Q. Five minutes, 10 minutes?

20 A. Five, 10 minutes.

21 Q. By whom?

22 A. CO Struthers and CO Mason.

23 Q. The two of them did it?

24 A. Yes.

25 Q. Why did it take two of them to do it?

1 A. They were calming me down because I was very
2 upset.

3 Q. Were you crying?

4 A. Yes.

5 Q. What was the conversation?

6 A. That she shouldn't have left me there like that.
7 Then they opened what they call a "pie hole," it's a hole in
8 the door, and asked me to put my arms out so that they could
9 remove the handcuffs.

10 Q. And removing the handcuffs is simply unlocking
11 them with a key and taking them off?

12 A. Yes.

13 Q. And that's what they did five or 10 minutes after
14 Craft left.

15 A. Yes.

16 Q. Had you had difficulties with Sheila Kizer before?

17 A. Not that I'm aware of.

18 Q. Were you physically afraid of her?

19 A. No.

20 Q. But you didn't like being handcuffed in a cell
21 with another inmate?

22 A. I don't think anybody should be handcuffed in a
23 cell with an inmate who isn't.

24 Q. There's a safety issue there?

25 A. It's a safety issue.

1 Q. How long were Struthers and Mason with you --
2 strike that. Did Struthers and Mason come up to you within
3 minutes of Craft leaving the area?

4 A. Within five or 10 minutes.

5 Q. And during that time were you crying?

6 A. Yes.

7 Q. And were you crying because you were emotionally
8 upset, or because you were in physical pain, or both?

9 A. Both.

10 Q. During those five or 10 minutes, what was Sheila
11 Kizer doing, if anything?

12 A. She was yelling for someone to come get the
13 handcuffs off of me.

14 Q. And those guys responded.

15 A. Yes.

16 Q. And they did it through the pie hole.

17 A. Yes.

18 Q. And that's an opening in the door of a cell?

19 A. Yes.

20 Q. And do they usually deliver food through that, is
21 that why it's called a pie hole?

22 A. They're supposed to, yes.

23 Q. That's kind of a gross term. And they -- did you
24 also ask to see a doctor at that time?

25 A. Yes, I did.

1 Q. Who did you make that request to?

2 A. Officer Buchanan and Officer Mason.

3 Q. How long after Craft left did you make that
4 request?

5 A. Immediately.

6 Q. What was their response?

7 A. They could call the on-call doctor.

8 Q. Did they come back and tell you what happened when
9 they did that?

10 A. They told me to put ice on it and to take Tylenol.

11 Q. Did they tell you that's what the doctor told
12 them?

13 A. Yes.

14 Q. Did they give you Tylenol?

15 A. I didn't take any Tylenol.

16 Q. Did you refuse it?

17 A. I didn't refuse it. You have to pay for it, so
18 you have to ask for it if you want it. So I don't think
19 that I took any right then.

20 Q. Did they give you ice?

21 A. Yes.

22 Q. Did you apply that?

23 A. Yes.

24 Q. And did that have any effect on your discomfort?

25 A. I don't recall.

1 Q. All right. What caused them to schedule an
2 appointment with a doctor?

3 A. I insisted upon it.

4 Q. Why did it take until May 16th to see him?

5 A. Because I had to have a family member.

6 Q. Because what?

7 A. I had a family member -- I made a call to a family
8 member.

9 Q. And they pushed up the appointment.

10 A. Yes.

11 MR. MARNEN: I don't think I have any more
12 questions. Thank you very much for your patience.
13 It's been almost three hours, I didn't think it
14 would take this long.

15 You have a right to review the transcript
16 when it's prepared for accuracy. You have a right
17 to waive that right, too, if you want to. If you
18 want to do it, then I guess you make arrangements
19 with the court reporter.

20 THE WITNESS: I'll review it.

21

22 (Deposition concluded at 11:39 a.m.)

23

24

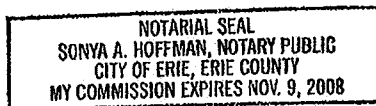
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C E R T I F I C A T I O N

I, Sonya Hoffman, a Court Reporter and
Notary Public in and for the Commonwealth of
Pennsylvania, do hereby certify that the foregoing
is a true and accurate transcript of my
stenographic notes in the above-captioned matter.

Sonya Hoffman
Court Reporter and Notary Public

Dated: *January 24, 2007*



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		and I'm [1] 72/11
		Andres [4] 31/21 32/6 87/1 90/23

A	arm [10] 57/7 57/8 69/1 81/2 82/20 82/21 83/8 83/14 107/25 108/6 arm -- [1] 82/20 arms [15] 56/9 56/11 77/25 80/24 81/3 81/4 81/11 82/18 82/24 84/5 84/6 84/9 85/23 110/11 112/8 arose [2] 27/9 107/14 around [20] 32/21 34/17 34/25 40/9 40/19 40/21 43/1 43/10 44/22 67/21 74/9 76/7 77/14 77/17 77/17 77/21 79/15 79/18 83/23 107/23 around -- [1] 40/19 arrangements [1] 115/18 arrived [2] 42/9 71/8 as [66] 3/2 3/23 5/8 5/13 7/9 10/3 11/23 12/3 12/16 12/24 12/25 13/21 13/25 21/15 26/11 27/9 30/10 30/10 40/9 41/4 44/23 44/23 45/14 47/6 47/23 47/24 49/4 51/22 57/3 57/6 60/5 62/23 65/3 67/11 68/1 68/6 69/5 69/25 71/20 71/25 76/2 77/23 78/13 78/15 78/15 80/22 83/17 86/18 88/6 90/23 90/24 93/13 96/1 96/2 96/3 98/5 98/6 99/7 99/8 99/9 100/23 101/4 101/6 107/8 107/10 107/12 aside [1] 79/20 ask [8] 3/13 43/8 99/15 100/5 102/9 104/8 113/24 114/18 asked [11] 22/12 42/24 43/18 56/19 66/8 66/12 94/20 98/7 98/9 99/18 112/8 asking [2] 32/16 94/19 assault [2] 107/15 108/8 assaulted [1] 107/7 asserts [1] 12/3 assigned [1] 20/19 assistant [3] 8/11 8/15 8/19 assume [1] 103/1 assumed [2] 106/14 106/21 assuming [3] 20/19 44/7 55/21 at [105] 1/11 1/11 4/3 4/9 4/15 4/19 5/1 7/6 7/9 8/10 8/12 8/13 8/22 10/7 11/11 11/18 11/20 11/23 12/8 16/14 17/11 18/12 18/20 18/23 19/13 19/22 20/23 22/7 22/14 22/18 23/9 23/21 23/22 23/22 24/12 24/17 26/17 26/18 28/6 29/6 29/22 30/14 33/4 33/7 33/7 33/18 34/8 34/23 35/13 36/1 36/13 37/5 37/14 41/3 41/11 41/19 42/9 43/3 43/17 44/8 45/18 47/4 47/9 47/16 52/21 54/19 55/6 55/22 59/2 59/2 64/22 65/14 65/15 66/9 67/19 72/10 74/25 76/10 77/20 78/17 78/23 78/25 80/1 85/12 86/9 87/25 88/7 88/8 88/9 90/2 92/22 93/21 95/13 98/11 100/21 101/8 101/25 103/5 105/2 109/8 109/15 110/22 111/15 113/24 115/22 at -- [1] 65/14 attached [1] 10/6 Attachment [1] 10/20 attacked [2] 49/5 49/14 attempt [1] 102/14 attempted [1] 102/15	attended [1] 8/10 attention [2] 61/1 100/22 attitude [5] 48/2 48/6 71/20 71/25 72/1 attitude -- [1] 72/1 attitudes [1] 71/18 available [1] 18/21 avoid [1] 109/3 aware [6] 34/23 47/3 61/17 61/18 98/3 112/17 away [13] 53/13 53/15 55/9 58/17 81/10 81/16 81/17 82/19 82/22 82/24 108/6 110/5 110/9
	B	
ANN [5] 1/2 1/8 1/18 2/4 3/8 another [14] 6/6 13/23 36/11 40/7 41/9 45/16 49/15 54/2 66/8 66/12 66/15 107/2 111/14 112/21 another -- [1] 66/8 answer [2] 3/17 32/17 any [55] 4/5 8/4 9/5 15/14 19/20 20/3 22/14 22/17 26/15 42/15 46/19 46/24 47/1 49/18 50/13 51/19 55/18 59/21 64/14 67/18 68/16 71/1 71/16 71/17 71/18 71/18 71/18 73/5 82/5 86/11 90/8 97/18 97/24 98/6 99/15 99/19 100/2 100/13 100/21 101/25 102/20 103/21 106/17 108/21 108/22 108/23 108/24 109/6 109/7 109/18 109/18 114/15 114/19 114/24 115/11 any -- [2] 71/18 108/23 anybody [13] 23/14 23/20 32/14 44/24 52/12 63/4 63/5 80/3 97/23 97/24 102/23 106/4 112/22 anyplace [1] 97/6 anything [35] 9/1 13/3 17/3 45/22 51/21 54/10 59/19 59/20 66/10 68/5 68/18 68/22 70/7 71/18 72/25 73/3 73/3 74/6 76/9 76/10 76/12 80/4 82/7 82/8 82/9 82/23 98/1 98/2 98/7 99/16 108/24 108/24 109/9 109/15 113/11 anyways [1] 78/9 apologize [1] 7/10 apparently [4] 18/22 20/9 86/25 88/15 appeal [17] 89/12 89/13 89/17 90/5 90/15 90/18 90/21 93/8 100/5 100/6 100/7 100/22 104/18 104/20 105/23 106/1 106/18 Appeals [1] 104/14 appear [7] 11/7 11/17 65/6 68/1 88/7 92/16 92/20 appears [2] 14/5 89/8 apply [3] 60/2 110/1 114/22 appointment [3] 85/24 115/2 115/9 approached [1] 43/20 appropriate [1] 64/16 approximate [1] 13/13 approximately [1] 47/10 are [51] 3/14 6/20 6/23 6/25 7/19 7/21 7/23 9/3 10/6 10/13 11/8 11/18 14/24 23/24 24/4 25/25 28/22 29/13 33/5 35/6 35/12 35/15 35/23 37/21 37/23 37/23 38/3 39/4 39/4 40/4 41/3 41/6 41/7 42/5 46/17 49/9 60/1 60/3 62/6 65/14 85/2 89/21 90/7 93/8 93/15 96/7 101/21 103/17 104/15 110/9 111/9 are -- [2] 7/21 37/23 area [36] 14/23 16/17 24/16 25/8 29/11 36/12 37/18 39/16 39/17 40/14 40/18 42/2 42/8 42/23 43/1 43/18 51/1 51/7 52/14 52/18 52/22 53/1 58/19 59/2 59/22 59/23 63/17 64/23 67/19 77/1 77/15 83/6 83/12 83/22 108/6 113/3 areas [4] 12/4 20/11 20/17 62/24 aren't [2] 49/6 106/9	B-E-A-L-E-S [1] 86/5 B-E-A-L-S [1] 86/6 back [75] 20/11 36/1 36/7 43/16 43/24 44/11 52/16 54/9 55/13 55/14 56/2 56/9 56/11 56/15 56/24 56/25 57/3 57/6 57/9 57/18 57/22 57/23 58/4 58/19 58/20 58/21 65/14 65/15 65/19 66/11 66/22 66/23 66/25 67/6 67/9 67/11 67/22 68/1 68/2 68/10 68/11 73/12 74/12 74/14 74/22 75/11 75/19 75/20 76/2 80/17 80/23 81/3 81/4 81/22 82/16 83/6 83/7 89/18 91/6 93/1 94/12 94/12 94/18 97/2 97/21 99/7 99/12 101/11 101/12 101/14 104/12 105/9 107/4 107/18 114/8 backup [2] 72/25 74/12 bad [2] 20/12 110/12 basement [2] 28/10 28/15 basic [1] 102/8 basically [2] 36/2 36/5 be [76] 4/2 8/15 11/7 12/5 16/15 17/6 17/9 18/9 18/10 18/12 18/24 18/25 20/18 25/19 26/12 26/15 26/18 27/12 27/19 27/20 28/9 28/10 28/11 28/24 29/25 33/8 33/15 35/25 36/19 37/1 38/9 38/9 39/13 39/15 43/3 43/20 44/8 45/17 48/17 49/5 49/6 49/13 49/14 49/21 53/9 53/20 54/3 56/19 56/22 60/17 60/19 61/12 61/23 62/8 62/20 64/14 68/1 72/12 76/7 79/20 87/6 88/19 97/19 97/19 99/8 99/19 101/4 102/4 103/19 104/2 104/4 106/15 106/15 106/20 107/7 112/22 be -- [2] 38/9 53/9 Beals [5] 86/4 86/7 108/13 108/16 108/23 because [92] 3/18 3/23 6/11 14/19 16/5 18/9 18/23 20/10 20/12 20/18 24/15 29/21 30/5 30/11 34/21 34/21 35/18 41/9 41/16 41/19 43/9 44/22 44/25 46/2 46/15 46/16 47/12 48/3 48/7 48/18 49/2 49/4 49/7 49/12 50/6 51/17 53/21 54/7 54/9 54/24 55/2 55/9 55/19 55/22 55/24 57/25 58/16 58/21 60/2 60/16 61/8 61/19 61/25 62/12 64/20 66/10 70/19 71/16 72/11 73/2 74/12 74/19 76/9 76/13 77/21 79/15 82/1 82/20 83/12 85/18 87/15 87/24 90/6 90/8 91/2 91/10 91/14 94/10 94/22	

B	Board [1] 88/12 Bodine [3] 32/1 32/2 49/19 body [4] 82/23 83/9 83/21 110/16 book [1] 36/7 booking [5] 42/8 42/10 42/17 42/23 58/19 both [7] 63/22 78/21 78/25 79/2 103/15 113/8 113/9 bottom [9] 14/6 17/6 17/6 26/19 28/17 41/4 72/18 76/10 95/18 box [1] 101/9 boy [1] 9/7 brain [1] 70/23 break [2] 4/5 86/13 breakage [1] 108/18 Brief [3] 63/23 73/20 86/15 bring [3] 61/1 63/20 100/21 brings [1] 91/6 brought [5] 27/12 41/17 56/23 56/25 58/4 bruise [1] 84/13 bruises [4] 84/15 85/16 85/18 85/23 bruising [1] 109/5 bubble [2] 36/3 39/24 Buchanan [20] 51/12 51/15 51/23 52/11 52/15 52/20 53/4 53/14 55/16 57/20 58/15 58/18 58/23 61/20 65/16 67/16 80/2 80/21 91/19 114/2 Buchanan -- [1] 51/15 building [2] 33/21 64/20 Business [1] 8/13 busy [1] 48/3 but [92] 4/5 5/12 5/24 7/4 10/2 10/6 11/23 12/24 13/4 14/14 15/12 15/23 16/25 17/25 22/5 24/19 26/18 26/25 27/4 27/15 27/20 27/24 28/21 28/22 29/14 30/2 30/14 31/15 31/17 32/3 35/14 36/1 36/5 37/11 37/25 38/24 39/17 40/7 41/11 44/17 47/7 47/14 47/21 48/20 49/7 49/10 52/14 54/12 54/25 57/24 59/25 61/16 62/1 62/24 63/1 63/8 63/9 65/19 70/15 70/19 70/22 71/24 72/12 73/2 73/23 78/5 78/8 78/15 78/19 82/10 84/5 85/2 85/20 85/22 86/9 87/16 89/7 90/6 91/15 92/22 92/25 95/4 96/1 96/20 98/20 99/6 101/11 103/1 103/4 105/7 106/25 112/20 but -- [2] 35/14 37/25 butt [2] 77/6 77/7 button [4] 44/10 44/13 53/11 70/4 buttons [1] 79/17 by -- [2] 27/2 92/25	7/3 11/18 25/17 25/25 26/2 came [23] 15/13 29/21 32/20 32/21 34/8 42/7 42/22 43/25 46/10 57/3 58/21 66/22 68/1 68/2 68/10 75/19 75/20 76/2 94/12 94/18 101/11 101/12 109/16 camera [7] 24/4 29/17 40/12 40/13 41/19 51/11 69/18 cameras [4] 29/14 40/3 40/4 40/7 campus [3] 8/13 8/14 8/23 can [16] 4/5 10/3 13/13 23/18 36/3 38/24 39/25 61/3 70/14 70/14 70/19 72/16 79/13 84/1 87/18 100/9 can't [8] 28/21 32/3 32/11 35/19 54/14 54/20 88/19 105/13 cannot [3] 43/3 62/5 104/1 cans [2] 74/23 80/5 care [3] 67/20 100/3 106/15 Carina [1] 23/9 carry [1] 64/15 cars [1] 38/23 case [5] 11/24 13/24 61/2 72/13 107/4 categorized [2] 5/13 5/24 cause [1] 81/9 caused [1] 115/1 causing [1] 79/21 cell [81] 14/9 14/23 15/9 15/21 17/16 17/16 18/21 19/9 21/5 24/2 24/11 24/12 24/15 24/18 24/20 25/8 27/22 28/13 29/8 29/9 31/4 34/12 34/15 34/19 34/25 35/1 36/8 36/8 36/12 42/1 42/8 42/9 42/9 42/9 42/23 42/24 43/14 43/20 43/22 45/1 45/2 45/18 50/25 54/9 55/15 55/15 56/2 56/16 56/17 56/21 57/22 57/23 57/24 58/6 58/10 58/12 63/1 65/15 65/19 67/12 68/15 68/20 80/17 82/6 83/4 83/10 83/15 89/11 98/5 107/11 107/19 107/19 108/5 110/20 110/22 110/24 110/25 111/14 112/20 112/23 113/18 cell -- [3] 29/8 55/15 56/2 cellmate [7] 19/10 19/12 22/24 23/8 23/9 23/22 24/16 cells [16] 23/24 24/1 24/3 27/20 28/9 35/4 35/6 36/2 37/23 41/3 49/6 49/9 59/19 59/21 60/21 64/14 cement [1] 24/10 certain [1] 28/2 certainly [2] 15/25 60/20 Certificate [1] 11/3 cetera [1] 11/13 chain [5] 76/14 76/16 76/17 77/12 79/12 change [1] 93/6 changed [2] 28/1 35/25 chapel [3] 38/15 41/8 41/15 Charge [9] 45/25 47/20 51/17 53/8 53/24 91/9 95/3 102/14 102/18 charges [7] 5/12 5/22 6/13 13/8 89/15 89/18 89/21 check [1] 107/7 checked [5] 16/12 16/14 101/8 101/9 101/12 Checks [1] 6/2
C	C-A-R-I-N-A [1] 23/11 C-O-R-R-I-N-A [1] 23/10 California [1] 107/3 call [11] 18/25 19/1 25/4 36/3 66/11 75/21 79/9 95/3 112/7 114/7 115/7 called [7] 15/20 33/18 66/25 72/25 74/11 105/12 113/21 calls [2] 30/3 30/4 calming [1] 112/1 Cambridge [9] 4/19 4/20 4/23 5/3	

C		
chest [1] 83/22	50/8 66/2	course [5] 8/19 12/20 13/23
Chief [5] 38/5 38/8 92/13 97/17	concerning [4] 6/15 86/21 94/3	60/10 85/23
103/7	94/4	court [4] 1/1 10/14 11/9 115/19
children [1] 9/5	concerning -- [1] 94/4	COURT [1] 1/1
choice [2] 46/17 66/20	concerns [4] 49/16 97/19 99/20	cover [2] 73/18 110/14
chronologically [2] 14/5 14/14	106/20	covered [2] 6/18 108/11
church [2] 41/15 41/24	concluded [1] 115/22	CRAFT [42] 1/5 30/24 31/2 31/3
City [2] 8/3 8/14	condition [1] 35/17	31/15 32/19 33/18 34/8 34/14
Civil [1] 1/3	conduct [2] 107/16 109/2	42/4 42/22 45/4 46/13 46/19
civilian [1] 88/23	confined [1] 11/18	47/17 49/24 50/22 52/21 53/2
claim [1] 60/17	conflict [1] 71/17	53/10 55/4 55/5 56/4 58/17
Clarion [2] 8/12 8/22	confusion [1] 107/12	61/20 62/19 62/25 65/16 72/19
Class [1] 89/20	connect [2] 76/7 76/14	80/16 86/20 86/25 91/21 95/22
classification [1] 98/25	consecutive [1] 5/17	107/8 107/16 110/15 110/19
classifications [3] 25/21 101/3	considered [1] 6/22	111/5 112/14 113/3 114/3
101/21	consistent [1] 48/10	cram [1] 24/3
classified [3] 25/19 101/4 101/6	conspiracy [1] 5/14	Crossroads [1] 4/12
classify [1] 42/11	continue [2] 55/20 111/11	crying [3] 112/3 113/5 113/7
clear [1] 34/3	continued [7] 49/10 53/2 74/11	cuff [1] 64/16
close [2] 44/4 44/13	89/11 98/4 98/5 98/5	cuffed [1] 57/3
closed [5] 43/24 44/1 44/20 58/12	control [9] 39/23 40/2 40/9 40/16	cuffs [2] 111/13 111/15
69/23	40/21 43/2 43/4 44/1 44/13	
closer [1] 24/4	controls [1] 64/16	D
closet [1] 42/21	contusions [2] 85/11 109/14	data [1] 8/7
closing [1] 69/25	convened [2] 104/4 104/5	date [16] 3/9 9/11 12/6 13/4 13/7
CO [14] 33/18 72/19 89/7 90/23	conversation [37] 53/6 53/7 53/23	13/11 14/9 14/10 16/7 16/12
90/23 95/17 95/22 95/22 95/23	54/16 55/20 55/22 57/25 58/18	16/24 88/18 98/14 98/16 98/17
96/3 96/23 96/24 111/22 111/22	58/25 68/16 69/20 69/24 70/13	98/18
cocky [1] 71/24	71/16 72/4 74/16 75/3 77/23	dated [4] 88/3 92/16 92/18 97/15
College [1] 8/14	78/20 79/2 79/7 82/5 82/10	dates [2] 12/10 30/12
color [3] 84/22 85/9 85/10	82/13 90/1 91/9 91/11 91/15	daughter [4] 27/10 27/11 27/15
colorful [1] 79/5	91/18 91/24 92/2 92/21 97/23	50/12
column [2] 14/8 16/17	97/24 105/18 111/5 112/5	day [11] 12/15 13/10 27/10 27/18
come [26] 18/2 26/11 35/7 35/24	conversed [1] 78/13	29/19 32/19 32/20 41/11 51/12
39/12 40/17 42/4 43/16 43/18	conversion [1] 88/22	51/19 62/13
43/19 53/12 53/21 53/24 55/14	convicted [2] 6/9 6/11	day-shift [1] 32/4
58/23 66/25 67/6 67/9 67/11	conviction [1] 6/16	days [8] 59/25 85/3 101/25
67/22 74/21 81/18 98/5 113/2	convictions [1] 6/18	103/14 103/20 103/24 104/3
113/12 114/8	cool [1] 96/4	104/17
come -- [1] 42/4	copied [1] 10/6	deal [1] 66/19
comes [1] 81/11	copies [3] 13/3 63/22 103/18	December [11] 12/12 13/5 14/20
comfortable [1] 66/16	copy [14] 10/1 11/6 13/1 33/2	16/17 16/23 17/15 60/22 60/22
coming [6] 34/22 36/6 36/6 51/1	33/4 36/17 36/18 36/19 60/10	61/7 62/16 62/17
55/19 94/12	63/19 64/18 65/9 73/8 87/17	December -- [1] 60/22
commencing [1] 1/11	Corina [1] 24/17	December 11 [2] 16/17 17/15
comment [3] 18/7 50/3 54/7	corner [7] 51/8 74/10 76/24 77/8	December 4 [3] 12/12 13/5 14/20
commit [1] 5/14	77/9 79/24 97/13	December 4th [1] 62/17
commitment [2] 12/18 13/5	correct [181]	December of [1] 61/7
committed [1] 13/7	correctional [16] 4/21 22/13 25/18	deception [1] 5/14
committee [9] 26/7 104/1 104/3	45/16 47/6 47/8 49/3 49/15	decide [1] 25/24
104/5 104/6 104/15 104/17	49/19 51/18 51/20 54/2 56/18	decides [1] 26/11
105/24 106/2	94/11 95/1 107/8	decision [7] 89/8 93/4 104/18
Commonwealth [1] 1/10	correctly [1] 62/14	105/9 105/24 106/2 106/12
commotion [3] 91/3 91/13 92/1	cot [2] 15/12 24/19	decision-maker [1] 89/6
communicate [1] 66/21	cots [2] 24/2 24/6	Decisions [1] 104/15
complaint [3] 10/2 95/20 107/4	couches [1] 38/4	Defendant's [40] 2/12 2/13 2/14
complete [2] 8/20 8/23	could [17] 22/16 49/5 49/14	2/15 2/16 2/17 2/18 2/19 2/20
completed [1] 102/13	49/14 49/16 66/8 66/14 74/20	2/21 2/22 2/23 2/24 9/25 10/3
completely [2] 106/17 106/19	78/2 84/20 85/19 85/20 91/17	12/13 12/16 13/20 13/22 33/1
completing [1] 102/8	104/7 104/21 112/8 114/7	36/20 36/21 36/22 51/4 60/4
complies [3] 11/16 64/9 100/16	couldn't [6] 59/19 78/1 78/3	60/6 61/6 63/25 64/1 72/10
comport [1] 24/25	80/13 85/20 97/24	86/17 86/18 87/9 87/10 88/10
comprised [2] 10/13 21/2	couldn't -- [1] 85/20	90/13 92/11 92/12 93/12 93/14
computer [2] 18/22 18/23	counter [1] 109/12	Defendants [3] 1/5 1/20 87/11
computerized [2] 26/9 26/10	County [30] 8/23 12/4 12/11	defensive [3] 48/7 48/15 72/2
computerized -- [1] 26/9	12/18 14/24 16/5 18/22 20/2	defensively [1] 72/1
conceptually [1] 27/4	26/6 26/16 26/25 31/5 31/9	define [1] 64/19
concern [5] 49/12 54/1 59/11	35/14 37/3 38/22 39/5 41/12	degree [3] 8/17 8/24 8/25
66/11 100/4	42/14 47/9 59/20 60/7 60/17	delayed [1] 83/2
concerned [5] 48/25 49/24 50/4	60/20 61/7 62/15 64/22 97/20	deliver [1] 113/20
	105/2 109/16	delivered [5] 87/1 92/22 93/9
	couple [2] 10/5 83/3	105/11 105/15

D	56/6 59/17 61/5 61/13 61/15 62/1 62/14 65/16 66/23 67/2 67/4 72/16 72/25 73/2 73/3 73/3 73/8 73/11 76/12 78/5 80/4 80/11 82/7 82/8 83/2 83/5 86/14 87/13 87/24 90/4 92/8 93/7 93/7 96/9 97/8 97/13 97/25 98/1 98/12 99/1 99/5 99/17 100/7 100/17 102/9 106/22 107/10 111/25 113/20 115/18 doctor [15] 18/1 18/15 18/16 85/3 85/5 86/3 86/7 86/8 109/24 109/25 110/7 113/24 114/7 114/11 115/2 document [30] 10/4 10/18 11/17 12/17 12/19 13/23 13/25 14/2 17/2 18/17 20/13 20/24 21/21 21/24 33/6 60/6 61/5 64/8 88/17 88/18 90/17 92/22 93/9 93/14 93/16 96/17 97/21 99/12 107/6 107/16 document -- [2] 88/17 107/6 documents [4] 10/6 26/14 32/10 87/12 does [20] 9/19 13/4 14/17 14/21 15/2 15/7 16/3 16/20 17/3 18/4 24/25 28/7 55/8 68/7 83/17 87/11 87/13 91/5 93/5 98/16 doesn't [4] 15/7 64/19 86/9 87/4 doing [7] 6/25 7/2 32/6 32/7 72/11 76/9 113/11 don't [79] 3/16 3/16 4/6 13/1 13/3 15/13 16/4 16/24 18/20 20/7 20/16 20/21 21/9 22/3 22/18 26/15 28/10 28/15 30/11 31/25 32/2 32/17 38/19 40/6 40/7 40/8 41/13 44/7 44/8 44/16 46/15 46/23 47/12 52/2 54/10 57/24 59/18 59/18 60/1 60/2 61/8 61/8 61/9 62/2 67/3 68/3 70/6 70/12 72/9 72/15 72/23 73/1 73/6 74/13 74/15 76/19 77/11 77/16 80/2 80/12 82/21 84/4 86/1 89/25 91/1 95/4 95/25 98/23 99/8 99/9 102/22 103/3 103/4 105/21 110/2 112/22 114/18 114/25 115/11 don't -- [1] 77/16 done [15] 42/17 42/19 56/13 56/14 66/10 76/10 82/1 82/11 83/4 96/4 96/9 98/4 102/5 106/15 107/5 done -- [1] 107/5 door [36] 34/18 36/9 36/11 38/24 39/6 39/7 39/13 40/19 40/20 40/21 42/25 43/2 43/3 43/3 43/11 43/16 43/22 44/4 44/4 44/8 44/10 44/13 51/6 58/2 58/12 69/23 69/25 75/25 83/10 110/17 110/19 110/25 111/3 111/12 112/8 113/18 door -- [1] 43/16 doors [12] 36/13 36/13 39/4 39/4 39/9 39/11 74/22 75/7 75/13 77/8 79/23 80/1 dormitory [3] 37/24 37/25 38/2 Douglas [1] 51/12 down [39] 24/1 30/3 30/17 33/9 35/16 35/18 41/3 41/22 43/25 44/22 44/23 44/24 53/21 58/22 60/1 64/12 72/11 74/12 74/14 74/22 75/11 75/19 75/20 76/2	77/15 79/14 84/6 88/18 93/24 94/23 101/16 101/20 101/20 103/25 104/14 107/25 108/3 110/16 112/1 down -- [2] 72/11 74/12 downwardly [1] 77/2 Dr [4] 86/4 86/7 108/16 108/23 Dr. [1] 108/13 Dr. Beals [1] 108/13 drafted [1] 12/15 drawing [3] 36/23 37/2 41/4 drawing -- [1] 37/2 drawn [1] 36/15 drive [1] 38/23 dropped [1] 35/8 drunk [1] 35/7 DuBois [1] 8/13 duly [1] 3/2 during [16] 18/15 23/5 24/8 41/11 62/18 68/20 68/24 69/7 72/4 75/2 75/21 82/5 95/9 105/4 113/5 113/10 duties [1] 94/13 duties -- [1] 94/13 duty [1] 90/23
	E	
denied [1] 93/8 Department [3] 34/6 34/7 85/13 Department -- [1] 85/13 depended [3] 46/9 46/11 63/7 deposition [6] 1/8 3/11 3/13 36/23 106/7 115/22 Deputy [22] 38/6 38/8 88/15 89/2 90/1 92/13 95/15 96/12 97/17 98/21 99/24 102/19 102/21 102/21 102/22 103/4 103/7 103/9 103/13 104/2 105/9 106/12 describe [1] 107/15 desk [24] 24/5 34/18 35/1 35/21 35/23 39/15 39/20 40/18 43/1 43/18 43/18 43/20 51/5 59/2 82/17 83/1 83/8 83/16 83/17 83/17 83/20 84/17 108/8 110/15 detainee [2] 12/8 25/12 determine [1] 102/20 develop [1] 85/18 device [1] 109/7 diagnosed [1] 85/11 diaphragm [1] 83/23 did [187] did -- [1] 108/16 didn't [55] 8/20 17/25 20/18 22/17 45/15 46/17 48/17 49/13 49/22 50/24 52/5 54/7 54/25 60/20 60/23 61/18 64/25 65/1 66/16 66/19 68/3 71/16 71/17 71/17 72/25 73/3 73/3 76/12 76/13 78/5 81/17 82/7 82/8 82/22 83/2 85/1 91/16 96/10 96/16 96/17 98/7 98/21 104/8 104/8 104/10 104/20 104/21 104/23 108/16 109/6 109/8 112/20 114/15 114/17 115/13 different [4] 26/24 47/12 60/2 93/25 difficult [1] 100/10 difficulties [2] 46/20 112/16 difficulty [1] 30/4 diploma [1] 8/7 Direct [2] 2/5 3/4 directly [2] 35/3 39/14 disagree [1] 62/2 disciplinary [2] 88/12 100/23 discomfort [2] 79/21 114/24 discovery [9] 13/24 60/10 60/13 60/14 61/14 61/15 64/5 92/25 96/18 discuss [2] 47/19 99/24 disobey [1] 70/25 disobeyment-type [1] 71/2 disorder [1] 20/1 dispositions [1] 103/17 disrupted [1] 53/24 dissatisfied [1] 104/16 distracted [4] 54/13 54/14 54/21 55/25 distracting [1] 91/24 DISTRICT [2] 1/1 1/1 do [92] 4/8 4/10 7/6 7/6 7/6 7/6 9/5 11/13 12/11 13/10 13/24 14/1 14/15 14/17 16/3 16/7 16/23 18/19 19/15 19/15 20/15 22/10 23/16 23/18 24/7 24/23 25/6 25/20 28/20 29/11 31/22 32/8 32/19 33/8 34/6 37/15 41/8 43/4 43/8 43/10 47/19 55/16	each [13] 11/12 26/19 36/8 36/13 36/14 39/9 46/20 47/1 53/15 55/9 76/14 78/18 81/16 earlier [3] 39/25 49/8 78/10 early [1] 34/22 easy [1] 94/6 education [2] 8/4 27/2 effect [2] 67/6 114/24 effort [1] 79/13 eight [1] 72/17 either [7] 35/11 42/19 49/20 61/20 72/3 79/9 101/4 elbow [1] 57/8 elevated [1] 78/20 elevator [63] 29/12 29/14 29/15 29/17 40/14 40/15 40/16 40/22 40/23 41/10 41/12 41/21 50/25 51/8 52/25 53/2 53/12 53/12 53/21 53/23 54/8 55/10 55/11 68/11 68/16 68/19 68/21 68/21 69/14 69/15 69/16 69/21 69/23 69/25 71/21 72/20 74/4 74/7 74/8 74/12 74/16 74/20 75/6 76/24 77/8 77/9 77/19 77/24 78/14 79/16 79/18 79/23 80/6 80/7 80/16 82/6 91/8 91/21 91/22 96/1 107/17 107/19 107/21 eligible [1] 25/12 eliminated [1] 22/16 else [20] 14/19 23/14 23/20 31/25 32/14 44/19 44/24 51/16 52/1 52/12 52/22 63/4 63/5 66/17 76/21 80/3 82/9 89/5 99/16 110/16 else -- [1] 63/4 emergency [3] 74/18 75/15 101/5 emotionally [1] 113/7 emphasis [1] 79/3 employee [5] 62/7 62/12 64/4 64/24 99/6 employees' [1] 62/9 employer [1] 7/15 employment [1] 7/12 en [3] 50/24 55/1 75/18 enclosed [4] 11/8 39/23 39/24	

E	express [2] 59/11 66/11 expressed [2] 54/24 59/12 expressing [1] 53/25 expression [1] 101/15	follow [5] 49/22 61/18 100/9 107/9 107/13 followed [1] 55/17 following [4] 18/23 57/20 59/25 90/24 follows [2] 3/2 10/18 food [1] 113/20 for - [2] 30/7 48/14 force [2] 69/5 95/23 forearms [3] 84/7 84/16 84/17 forgery [1] 5/14 forget [2] 12/15 96/22 forgot [2] 29/1 41/3 forgotten [1] 105/11 form [13] 10/14 10/24 88/5 95/7 95/8 95/9 96/21 100/5 100/6 102/4 102/8 102/13 103/18 formal [5] 8/4 102/1 103/16 103/19 103/23 forms [1] 99/15 forth [2] 42/13 44/11 fortunate [1] 100/11 forward [1] 102/13 Foster [1] 92/13 found [12] 6/11 61/4 74/10 89/11 89/13 89/16 89/23 90/7 90/11 91/7 91/12 91/17 four [6] 15/16 24/1 35/4 72/17 89/15 89/18 fracture [1] 108/19 fractures [1] 109/6 frequently [1] 63/16 fresh [1] 94/17 friends [1] 25/5 front [14] 39/15 48/23 48/24 50/20 57/3 61/5 65/15 65/20 66/21 67/4 67/12 80/25 83/12 83/13 fuck [1] 72/20 full [1] 3/7 further [4] 93/3 104/14 106/18 109/3
enclosed... [1] 40/21 encounter [1] 40/12 end [12] 18/20 24/12 36/2 36/14 72/2 93/10 93/11 99/12 99/14 100/12 106/12 106/16 ended [4] 52/14 77/18 77/19 98/3 enemies [1] 22/18 enough [2] 35/8 100/11 enter [8] 5/3 13/2 26/9 38/21 39/5 41/4 42/12 42/14 entered [2] 12/11 68/19 entire [10] 56/11 59/12 73/4 76/8 76/12 80/24 87/21 90/6 97/18 98/8 entitled [2] 10/9 12/17 entrance [1] 60/16 entry [2] 14/13 21/15 envelope [2] 11/6 11/7 Erie [5] 1/3 1/13 1/22 4/16 7/19 escort [2] 46/13 68/11 escorted [10] 30/19 30/21 31/3 31/5 31/13 31/20 32/2 32/5 56/2 58/10 Esquire [1] 1/21 et [1] 11/12 even [10] 27/22 48/12 48/12 50/13 52/25 65/3 74/19 80/12 85/15 104/7 even - [1] 52/25 evening [1] 32/5 event [3] 5/21 102/1 104/1 events [1] 3/14 eventually [1] 13/8 ever [22] 5/1 12/22 14/2 31/3 35/12 35/16 41/14 46/5 46/13 47/4 60/12 63/2 63/5 64/17 75/13 82/19 90/8 95/25 97/1 104/5 105/1 106/4 ever - [1] 97/1 every [5] 27/17 29/25 31/9 46/8 64/22 everybody [1] 52/21 everything [1] 94/22 everywhere [2] 36/13 64/20 evidence [2] 36/15 36/19 exact [3] 30/12 47/21 72/9 exactly [10] 16/23 16/24 22/3 40/8 54/14 70/24 71/4 71/5 73/1 73/7 Examination [2] 2/5 3/4 examined [2] 84/4 109/5 example [1] 26/17 except [3] 66/10 86/11 90/19 exert [1] 69/5 Exhibit [52] 2/12 2/13 2/14 2/15 2/16 2/17 2/18 2/19 2/20 2/21 2/22 2/23 2/24 9/25 10/3 12/13 12/16 13/20 13/22 26/17 30/8 33/1 33/3 36/20 36/21 36/22 51/4 60/4 60/6 61/6 63/25 64/1 65/6 72/10 86/17 86/18 87/9 87/10 87/11 87/25 88/10 88/11 88/12 89/18 90/13 90/14 92/11 92/12 93/12 93/14 101/8 107/5 exhibits [1] 52/10 exited [1] 45/2 expect [1] 68/9 explain [3] 3/12 48/16 65/25 explained [2] 54/4 65/22 explanation [1] 61/24	F face [1] 68/4 facing [1] 83/13 fact [6] 33/2 34/23 44/8 48/6 93/5 93/6 facts [1] 72/12 fair [7] 30/15 30/16 47/15 50/9 50/10 69/11 78/17 family [5] 25/4 27/11 115/5 115/7 115/7 far [5] 30/10 53/13 53/15 67/23 96/1 fast [2] 77/16 81/23 faster [1] 82/3 FEDOREK [10] 1/2 1/8 1/18 2/4 3/8 9/24 34/19 42/5 55/10 96/5 feeding [1] 40/4 feel [2] 66/16 91/1 feet [3] 53/16 55/9 82/23 felt [2] 56/20 111/10 female [4] 31/5 31/6 47/8 48/4 females [1] 44/25 Ferguson [1] 1/25 fight [1] 94/6 figure [1] 3/19 file [3] 100/21 102/1 103/18 filed [7] 10/7 94/2 94/4 100/25 105/1 105/6 105/7 fill [2] 99/15 102/10 filled [10] 10/16 12/25 32/23 32/23 88/3 95/15 96/20 98/20 99/7 99/9 filled - [1] 32/23 final [1] 103/19 finally [2] 18/16 25/4 find [5] 3/13 59/19 62/5 64/25 83/20 finding [2] 61/2 90/3 fine [1] 32/17 fire [1] 41/9 first [45] 3/1 6/4 6/10 6/16 10/9 12/2 12/17 14/8 14/13 14/14 17/7 19/13 23/4 25/18 27/16 28/6 28/10 28/15 32/8 33/7 33/17 37/10 37/13 38/11 41/15 42/15 45/17 49/7 53/22 54/2 56/13 56/16 56/23 56/25 57/2 63/2 74/14 74/14 75/10 90/22 90/22 93/16 93/21 107/17 107/18 five [16] 19/25 25/21 26/11 33/18 33/22 47/12 47/14 72/17 74/25 101/25 104/17 111/19 111/20 112/13 113/4 113/10 flailing [1] 81/10 flared [1] 82/24 flat [1] 83/18 flip-flopping [1] 79/15 floating [1] 67/21 floor [36] 17/7 17/8 17/9 24/6 28/10 28/11 28/13 28/17 29/2 37/6 37/8 37/9 37/10 37/11 37/14 40/1 40/25 41/1 41/4 41/15 41/15 41/24 53/22 63/18 74/10 74/14 74/14 74/15 75/9 75/10 75/13 77/4 77/15 77/19 79/14 80/8 floors [2] 74/13 75/16	G G-A-U-D-E-N-Z-I-A [1] 4/11 gate [1] 39/16 Gaudenzia [2] 4/10 7/6 Gaudenzia-Crossroads [2] 4/9 5/1 gave [16] 5/21 12/22 13/23 32/22 60/10 61/24 64/5 64/18 73/8 92/25 94/25 95/4 95/15 95/16 96/20 96/21 general [19] 5/13 5/13 5/25 8/12 8/24 14/23 17/13 20/17 21/13 21/18 25/9 35/8 35/20 41/25 49/4 49/7 49/11 49/21 59/22 general - [1] 5/13 generally [1] 27/10 gently [1] 56/6 gestures [1] 3/18 gesturing [1] 77/24 get [61] 6/9 8/17 10/24 13/3 25/7 25/7 26/5 29/8 29/11 29/24 30/18 32/20 32/21 33/4 33/19 34/8 34/19 34/24 36/8 36/12 36/14 36/16 38/25 40/22 40/23 46/10 53/22 54/8 55/2 55/3 55/10 55/10 56/20 63/19 66/23 71/12 72/19 73/17 74/4 75/5 78/15 79/14 80/6 80/6 80/7 82/1 82/2 91/8 91/22 94/6 94/6 94/8 95/6 97/1 97/24 98/21 100/8

G	103/14 104/1 104/1 104/3 104/4 104/6 104/15 104/16 104/17 105/1 105/24 106/2 106/13 106/20 grievances [3] 94/8 101/3 101/4 gross [1] 113/23 ground [7] 28/18 28/22 37/11 37/12 37/13 77/18 107/22 ground -- [1] 77/18 grouped [1] 6/6 guess [13] 10/24 16/4 37/10 37/14 39/12 51/5 73/17 77/22 88/5 106/7 107/17 107/22 115/18 guest [1] 107/7 guilty [17] 6/8 6/13 6/14 88/23 88/25 89/11 89/13 89/16 89/23 90/3 90/8 90/11 90/11 90/12 91/7 91/12 91/17 guys [2] 81/1 113/14	76/14 79/13 90/5 90/6 92/6 92/7 107/13 107/21 107/23 110/12 110/13 111/2 111/9 112/9 112/10 113/13 handcuffs -- [1] 45/19 handed [1] 105/16 handling [1] 36/22 handle [1] 96/2 handling [1] 64/16 hands [11] 43/20 45/14 48/21 48/23 70/16 74/8 74/11 76/3 76/11 77/24 94/9 handwriting [8] 10/11 10/16 10/19 90/18 93/25 97/6 97/8 99/21 hanging [1] 84/1 Hannah [1] 9/14 happen [3] 49/14 99/18 102/9 happened [9] 34/16 52/7 77/16 94/21 94/22 98/6 98/10 101/15 114/8 happens [1] 42/10 happy [1] 105/21 hard [1] 82/21 has [11] 3/18 3/19 3/23 21/8 29/13 34/17 36/9 40/7 44/24 97/12 102/1 hasn't [2] 35/8 59/20 have [182] have -- [3] 41/9 87/11 98/8 have. [1] 50/14 have. [1] 50/14 haven't [1] 86/11 having [10] 3/2 35/19 53/23 54/24 61/2 78/19 91/9 91/10 91/18 92/2 he [75] 50/25 51/17 51/18 51/24 52/6 52/17 52/18 54/6 54/7 54/10 54/12 54/15 54/20 54/21 54/23 54/24 54/25 55/17 55/18 55/19 55/22 55/25 59/2 59/8 59/9 59/13 59/14 65/22 65/25 66/5 66/8 66/11 66/11 66/12 66/18 66/21 66/23 66/25 66/25 67/2 67/4 67/6 67/9 80/11 80/12 83/13 86/8 86/9 89/5 90/2 92/18 94/11 94/12 94/18 94/18 94/20 94/21 94/22 95/2 96/15 96/15 97/12 100/1 103/1 103/4 105/12 105/16 105/20 105/23 106/1 108/16 108/23 108/24 109/2 109/5 He -- [1] 80/12 He's [1] 102/22 head [2] 3/19 49/15 headed [1] 14/8 heading [2] 100/17 100/20 health [1] 86/11 hear [6] 3/15 3/16 48/17 70/14 70/19 74/20 heard [4] 99/14 102/23 104/6 104/10 hearing [6] 55/25 87/7 88/7 88/12 90/2 90/17 held [5] 35/6 57/7 80/22 83/9 110/16 help [2] 12/10 32/22 her [89] 9/9 9/11 9/13 9/20 30/3 32/4 32/6 32/7 32/8 43/18 44/19 45/15 45/18 46/23 46/25 47/4 47/6 48/1 48/16 49/19 50/13 50/20 55/8 57/25 66/11 66/16
get... [4] 100/10 100/11 108/6 113/12 getting [6] 53/25 55/14 56/22 72/22 72/24 94/19 girl [5] 9/7 9/8 27/13 50/5 77/18 girls [1] 27/25 give [17] 13/1 33/2 53/17 61/3 87/17 87/20 87/22 88/8 88/9 95/6 95/8 108/23 108/24 109/6 109/22 114/14 114/20 given [14] 5/17 22/14 48/11 48/12 51/19 65/9 90/8 91/15 94/7 94/24 96/11 99/19 100/2 109/14 giving [1] 71/1 glitch [1] 18/23 go [42] 5/9 11/11 11/15 14/5 15/6 18/1 21/9 21/15 25/24 25/25 26/21 26/25 27/1 27/2 27/7 34/15 34/17 36/4 39/6 39/25 40/20 43/10 50/22 50/24 54/9 63/11 63/14 63/16 65/14 65/22 70/4 74/24 76/7 86/14 88/18 89/18 90/9 92/3 96/2 100/14 104/7 111/11 goes [4] 14/9 72/23 101/19 103/13 going [54] 4/6 12/16 13/21 16/4 18/11 20/18 26/12 29/19 31/1 33/3 33/4 41/18 54/9 55/12 58/21 59/4 60/5 60/5 63/7 63/19 70/3 70/8 70/9 70/15 70/17 70/20 70/25 71/3 71/4 71/5 71/7 71/9 71/10 71/11 71/14 72/15 72/19 73/17 74/25 75/18 81/25 87/6 87/24 89/13 90/22 92/12 95/20 98/1 98/2 99/18 101/20 103/1 107/4 111/9 gone [8] 24/16 41/22 63/15 63/15 67/23 85/24 94/11 109/25 good [1] 30/11 Gornall [2] 1/12 1/21 got [28] 4/2 7/2 16/16 27/22 42/23 43/12 43/18 57/22 58/8 60/12 60/23 63/13 68/21 69/14 69/14 93/1 94/10 95/9 96/17 97/20 99/12 100/11 103/11 103/25 105/9 106/11 107/19 108/5 gotten [1] 7/4 grab [1] 82/25 grabbed [7] 74/9 76/5 76/6 77/12 82/16 82/22 83/6 grabbed -- [1] 82/22 grabbing [4] 76/16 76/17 79/12 107/21 graduate [2] 7/23 7/25 graduated [1] 8/8 graduating [1] 8/15 grandmother [1] 9/20 granted [1] 91/14 grasp [1] 108/7 grievable [1] 102/1 grievance [46] 93/15 93/17 93/19 94/2 94/5 94/10 94/19 94/24 94/25 95/5 95/6 95/17 95/20 96/21 97/4 98/11 98/12 98/17 98/19 98/25 99/3 99/7 100/8 100/10 100/18 100/21 100/25 101/5 101/11 101/21 102/2 102/4	H H-A-N-N-A-H [1] 9/15 H-O-L-E [1] 19/3 H-U-T-C-H-I-N-S-O-N [1] 9/17 had [109] 6/10 6/12 6/15 8/4 8/6 11/20 11/24 12/3 14/19 18/7 19/20 20/2 20/3 20/10 20/17 24/16 25/19 26/5 27/16 30/3 30/7 30/14 30/16 31/3 31/8 31/8 31/9 32/3 34/5 34/5 34/23 35/13 41/19 42/25 43/10 43/11 45/7 45/14 45/24 46/1 46/2 46/2 46/15 46/19 46/19 46/23 47/7 47/18 49/16 50/3 51/22 53/21 54/2 55/1 55/2 55/22 56/19 57/7 57/25 58/17 59/9 61/15 61/23 62/10 62/25 63/2 63/10 63/15 64/23 65/23 66/25 68/8 69/23 70/4 70/20 75/7 77/23 79/16 81/2 81/3 83/4 84/20 85/16 85/24 86/11 89/15 90/4 92/21 94/11 94/18 94/21 94/22 98/6 101/14 102/20 104/6 104/22 105/6 105/7 105/23 106/1 106/4 106/22 109/13 109/25 112/16 112/16 115/5 115/7 hadn't [5] 61/2 66/10 76/10 82/1 82/11 half [2] 5/18 9/10 hall [2] 107/25 108/3 hallway [4] 36/2 36/14 39/12 42/8 hand [6] 33/3 57/14 76/18 76/23 77/11 77/14 handbook [14] 59/22 59/24 60/7 60/12 60/15 61/6 61/25 62/1 62/12 64/24 64/25 99/6 100/14 104/7 handbooks [1] 60/24 handcuff [6] 43/19 63/5 63/11 77/12 84/18 84/19 handcuffed [20] 43/21 48/22 49/4 49/5 49/13 49/22 50/20 61/13 61/23 62/21 62/22 62/23 62/24 62/25 63/10 63/13 63/16 78/1 112/20 112/22 handcuffing [1] 45/13 handcuffs [45] 43/19 45/7 45/9 45/10 45/16 45/19 45/19 45/22 48/20 48/25 49/20 50/5 50/7 50/9 53/20 54/1 56/18 56/19 56/21 58/1 59/3 61/19 64/15 65/23 67/14 71/7 74/9 76/5 76/6	

H	however [2] 32/6 102/17 hurt [2] 96/5 110/12 Hutchinson [2] 9/14 9/17	94/3 94/15 95/21 97/18 98/7 98/8 109/24 110/4 incidents [1] 5/24 included [1] 27/11 inconsistency [4] 48/14 91/3 91/14 92/4 indicate [3] 13/4 98/21 107/5 indicates [3] 16/16 87/6 89/12 indicating [1] 57/9 indication [1] 86/20 informal [11] 98/25 99/8 99/10 101/4 101/12 101/14 101/14 102/14 102/15 103/15 103/21 informally [1] 102/17 information [3] 26/10 42/12 86/2 initial [3] 12/18 13/5 96/11 injury [1] 109/3 inmate [39] 6/21 12/5 14/10 18/4 31/5 36/6 38/21 60/7 60/15 61/6 64/22 64/25 65/6 88/1 88/6 89/11 93/15 93/17 93/19 94/5 95/23 96/1 97/4 98/11 100/8 100/14 100/18 100/21 102/1 102/4 102/7 102/8 102/13 103/18 103/20 107/2 111/14 112/21 112/23 inmate's [2] 103/18 104/2 inmates [9] 15/14 35/6 52/14 55/3 64/13 67/20 86/9 104/15 111/11 inside [3] 37/19 65/19 74/8 insisted [2] 85/8 115/3 institution [2] 4/21 25/18 instruct [1] 102/7 instructed [3] 48/19 72/19 91/8 internally [1] 106/15 interpret [1] 3/24 interpretation [1] 98/22 interrupted [3] 53/21 55/24 70/4 into [26] 10/24 16/14 16/15 20/7 22/10 27/22 36/12 39/6 40/17 40/18 43/1 43/2 50/24 51/1 51/10 51/23 52/21 53/22 54/8 58/10 68/21 69/14 69/15 76/24 97/18 98/8 involved [3] 6/1 6/3 98/9 is [188] is -- [4] 12/17 72/18 95/20 107/16 isn't [4] 34/23 57/12 90/18 112/23 isolation [1] 19/7 issue [5] 102/18 104/4 107/13 112/24 112/25 it [335] it -- [2] 37/8 105/11 it's [59] 3/12 7/13 14/14 15/5 15/22 17/18 18/18 19/8 20/3 20/4 21/13 21/13 24/19 24/20 25/8 25/8 27/2 27/4 28/5 28/8 28/17 32/10 32/15 33/8 34/15 35/21 37/11 37/25 38/2 38/19 39/17 39/17 39/18 40/20 42/19 44/22 44/24 52/10 53/15 59/4 61/10 62/6 62/9 62/12 64/8 72/16 73/2 73/6 86/1 92/16 92/18 96/12 97/20 101/13 112/7 112/25 113/21 115/13 115/16 item [1] 15/6 its [1] 36/9
her... [63] 66/21 66/23 66/24 66/25 67/7 67/11 67/22 68/4 68/8 68/9 68/16 70/4 70/16 70/19 70/25 71/14 71/15 71/17 71/23 72/9 73/5 73/8 73/25 74/8 74/11 76/2 76/11 76/22 77/20 77/22 77/23 78/13 78/15 78/16 79/13 80/21 80/25 81/1 81/10 81/11 82/13 82/19 82/22 82/25 83/8 83/14 83/15 83/16 86/3 87/20 87/22 91/11 92/2 95/4 95/4 95/25 96/1 98/6 106/25 106/25 108/6 110/16 112/18 her -- [3] 46/25 80/25 87/20 here [21] 10/5 14/10 14/11 16/7 18/4 18/20 41/3 41/6 57/9 61/11 62/2 63/20 67/7 84/10 87/21 94/21 95/20 95/20 99/21 104/5 107/15 herself [2] 43/10 80/18 hey [1] 53/8 high [4] 7/23 8/3 39/18 39/19 high -- [1] 39/18 higher [3] 39/19 91/11 91/16 him [25] 50/24 50/24 51/1 51/10 51/22 52/3 52/21 53/1 53/7 53/19 53/19 53/25 54/16 59/1 59/11 66/2 80/16 83/13 86/10 92/2 92/17 92/20 92/21 105/18 115/4 himself [1] 51/24 hinges [1] 44/5 his [10] 38/11 51/15 51/20 52/5 86/3 89/8 92/15 94/12 94/18 105/12 hit [3] 46/9 70/4 75/15 Hoffman [2] 1/9 1/25 hold [5] 29/24 57/8 69/1 79/16 89/11 holding [49] 14/23 17/20 21/10 21/12 21/15 21/21 21/23 22/11 23/24 24/8 24/16 25/3 27/20 27/22 28/9 28/13 29/4 29/8 29/9 30/7 30/18 31/4 31/15 31/16 31/20 32/3 35/1 35/4 35/6 36/2 36/8 36/8 36/12 40/24 41/3 42/2 45/19 49/6 49/9 50/25 55/15 59/19 59/21 60/21 61/12 63/1 63/5 68/15 107/11 Holdnack [1] 1/25 hole [10] 18/25 19/1 19/24 20/3 27/24 62/23 112/7 112/7 113/16 113/21 hour [1] 85/15 hours [6] 28/2 33/11 34/3 59/25 102/18 115/13 house [3] 14/19 35/18 50/21 housed [18] 12/4 12/5 14/20 14/24 22/13 30/4 35/14 37/9 37/21 44/23 44/23 44/24 48/11 59/14 59/17 60/3 61/11 61/12 housing [7] 18/21 59/21 60/18 64/13 64/20 107/8 107/10 hovered [1] 77/8 how [27] 4/10 19/15 23/16 23/24 29/19 31/22 32/1 47/8 52/17 53/13 54/16 66/23 67/22 74/13 80/11 81/12 83/5 84/9 86/3 91/16 92/15 96/2 101/18 102/9 105/11 113/1 114/3	I I -- [2] 48/12 60/9 I'd [2] 10/2 30/16 I'll [16] 3/17 4/1 13/22 33/2 36/17 61/3 63/22 64/13 72/16 87/17 87/21 87/22 88/11 94/4 107/6 115/20 I'm [66] 5/4 6/21 6/21 6/21 10/3 12/16 13/21 16/4 19/20 20/19 20/19 27/15 28/5 29/1 31/1 32/16 33/3 33/3 33/4 36/21 47/3 53/9 59/4 59/5 59/5 59/6 59/10 60/5 60/5 61/2 61/10 63/19 64/1 64/11 70/8 70/15 70/17 72/10 72/11 72/11 72/15 72/19 73/12 73/17 73/22 74/19 75/17 76/8 78/8 80/10 83/20 87/24 90/14 90/22 91/6 92/12 92/19 93/13 95/16 95/20 98/3 98/19 103/1 106/9 107/5 112/17 I've [23] 7/4 7/4 12/24 32/10 35/12 35/14 35/16 38/2 41/14 41/20 41/21 44/22 44/23 47/6 61/9 61/19 61/25 86/10 90/6 92/20 94/6 102/23 104/10 Ice [5] 109/21 109/22 110/1 114/10 114/20 idea [6] 19/6 32/9 47/11 55/18 104/22 106/24 identification [13] 9/25 12/13 13/20 33/1 36/20 60/4 63/25 86/17 87/9 88/10 90/13 92/11 93/12 identify [1] 10/2 identifying [1] 88/6 if [63] 3/16 3/16 3/18 10/2 11/11 11/15 12/2 14/5 15/6 16/6 16/23 16/24 17/25 18/11 18/20 18/23 19/20 22/3 26/17 32/2 32/17 32/22 33/7 33/17 35/17 42/12 42/20 42/24 43/25 45/25 47/18 47/24 59/3 59/15 61/3 61/9 63/13 64/7 65/5 65/6 70/7 72/16 79/13 80/3 80/4 86/13 89/18 94/8 98/5 101/8 102/8 102/17 102/20 103/25 106/23 107/6 107/11 109/8 109/15 113/11 114/18 115/17 115/17 if -- [1] 17/25 imagine [1] 104/21 immediate [3] 52/22 109/14 109/24 immediately [6] 83/3 84/25 85/1 110/11 110/13 114/5 impression [1] 81/25 in [284] in -- [1] 14/21 in-depth [1] 27/3 inability [2] 110/3 110/6 inappropriate [5] 72/3 72/12 73/5 78/23 79/1 Inc [1] 1/25 incarcerated [2] 6/22 50/20 incarcerated -- [1] 50/20 incarceration [2] 105/3 105/4 incident [22] 11/24 12/6 13/18 23/5 27/9 32/24 33/19 34/1 52/6 73/4 73/14 76/12 85/15 87/3	J Jail [9] 14/9 16/2 16/15 61/12

J Jail... [5] 63/6 85/5 85/22 86/7 106/25 James [1] 1/21 January [3] 1/10 17/15 17/19 January 21 [2] 17/15 17/19 JENNIFER [9] 1/2 1/8 1/18 2/4 3/8 10/5 19/13 96/5 98/11 Jive [1] 16/20 Jives [1] 17/22 Job [1] 7/4 Joke [1] 18/9 Judge [2] 5/19 5/20 July [7] 13/14 13/15 13/17 25/15 60/23 61/7 62/17 July 26 [2] 25/15 62/17 June [1] 24/21 June 8 [1] 24/21 Just [51] 3/11 3/19 7/4 7/12 7/13 8/24 12/10 15/4 15/5 16/5 20/16 20/17 20/20 21/13 29/1 29/25 30/2 32/16 33/15 36/5 37/5 38/19 51/18 52/14 52/22 53/1 54/12 54/20 55/1 56/16 59/5 61/4 61/23 62/4 73/17 73/22 77/17 80/14 82/7 82/24 84/10 88/18 89/7 92/3 96/8 100/3 101/14 107/2 107/6 109/10 109/13 Just -- [2] 20/16 96/8	109/8 know -- [1] 91/6 knowledge [4] 20/3 35/15 79/11 101/18 known [3] 65/4 65/5 109/16 Knox [2] 1/11 1/21 Kylie [2] 23/15 24/19	locked [9] 30/5 39/4 40/19 64/13 64/19 64/21 110/25 111/3 111/12 locks [2] 39/9 39/17 lockup [1] 29/4 long [14] 4/6 17/25 32/15 44/23 52/6 54/16 54/17 67/22 67/23 73/2 111/18 113/1 114/3 115/14 longer [3] 22/3 25/8 100/4 look [14] 14/5 18/21 18/23 26/17 33/4 33/7 37/5 39/2 68/4 68/8 87/25 97/18 98/7 101/8 looking [5] 50/23 50/24 61/10 72/10 109/6 looks [2] 26/18 37/23 lose [1] 55/12 lot [4] 20/1 20/6 26/24 94/7 loud [4] 71/24 78/9 78/15 82/11 louder [1] 78/8 low [1] 35/8 lower [7] 17/3 17/6 20/25 21/3 21/12 21/18 97/12 Lyles [3] 38/8 92/13 103/7
K K-E-O-K-E-E [1] 31/2 K-I-Z-E-R [1] 23/6 K-Y-L-I-E [1] 23/17 keep [1] 87/18 KEOKEE [4] 1/4 30/24 62/25 107/8 kept [3] 53/10 53/11 53/20 key [1] 112/11 keys [1] 64/16 kill [1] 18/11 kind [12] 26/23 35/6 37/24 42/15 45/9 61/13 63/11 79/16 84/11 103/21 106/9 113/23 kitchen [11] 40/12 40/13 51/1 51/10 51/11 51/24 52/2 52/13 52/16 53/1 91/19 Klizer [10] 23/3 29/6 34/11 45/1 88/6 95/23 106/23 110/22 112/16 113/11 knew [13] 15/25 18/10 20/10 68/8 70/20 71/2 71/5 71/9 71/10 71/12 76/9 96/20 106/25 know [90] 14/17 15/13 15/20 15/23 16/3 16/4 18/19 18/20 19/15 20/7 20/15 20/16 20/18 21/9 22/3 22/10 22/18 23/16 28/10 28/15 29/19 31/22 32/2 32/8 32/16 34/21 34/22 38/9 38/19 39/18 40/6 40/6 40/7 40/8 41/17 44/16 46/23 46/25 47/12 48/18 49/18 52/2 52/5 52/6 54/21 54/23 54/25 59/18 59/18 60/1 61/5 61/8 61/9 61/9 62/11 64/10 66/23 68/3 72/12 74/13 74/15 74/20 75/17 76/19 77/11 77/16 80/3 80/12 84/1 86/1 89/25 91/6 96/10 96/15 96/17 97/25 98/23 99/5 99/8 99/10 102/22 103/3 103/4 104/7 104/8 104/10 104/21 105/21 106/23	L L-Y-L-E-S [1] 92/15 labeled [1] 33/8 laced [1] 79/2 language [8] 72/3 73/5 73/11 73/16 73/24 74/3 89/20 95/22 last [8] 11/3 11/6 14/13 81/17 91/15 92/15 95/4 100/9 late [1] 94/12 later [4] 25/7 54/25 71/3 85/3 law [1] 63/16 lawsuit [2] 12/20 12/23 lay [1] 83/17 laying [1] 60/19 least [8] 30/14 47/16 54/19 78/23 78/25 88/8 88/9 93/22 leave [4] 4/23 84/3 87/21 96/1 leaving [1] 113/3 left [16] 21/9 43/22 45/18 52/22 52/23 56/17 56/21 57/16 58/3 65/16 95/18 111/11 111/12 112/6 112/14 114/3 left-hand [2] 86/19 97/12 legible [1] 86/1 less [2] 18/9 54/18 let [14] 5/4 12/15 13/21 27/25 33/2 34/3 34/21 37/5 64/10 77/22 88/17 93/13 94/21 101/23 let's [5] 27/7 50/16 62/14 65/14 73/22 letter [1] 15/5 level [6] 25/25 28/18 28/22 28/24 35/8 37/11 library [1] 63/16 lieutenant [1] 51/21 lifted [1] 80/13 like [34] 3/23 10/2 18/8 21/13 33/22 34/15 35/17 36/16 37/23 37/25 38/2 38/18 39/2 42/6 48/17 49/8 51/21 55/24 56/21 60/18 72/24 74/6 82/23 83/22 84/20 84/25 88/7 96/9 100/10 108/25 110/11 111/10 112/6 112/20 like -- [1] 39/2 line [2] 41/16 48/15 lines [5] 39/2 42/7 47/22 54/24 72/18 links [1] 76/7 list [1] 14/14 listen [8] 32/16 48/18 70/9 70/15 70/18 70/22 71/14 72/19 listening [1] 70/20 little [8] 3/12 27/12 38/3 39/1 39/16 39/19 50/4 85/19 lived [1] 4/19 living [5] 7/13 7/13 22/7 60/1 63/4 Lobaugh [1] 5/20 located [2] 4/14 17/8 location [3] 14/9 16/2 44/9 lock [1] 64/23 lockdown [4] 19/8 20/4 22/20 22/21	M M-C-M-U-N-N [1] 19/16 M-E-I-T-U-S [1] 52/8 Mace [3] 74/23 75/23 80/5 Mace -- [1] 75/23 machine [2] 35/18 35/19 MacKenzie [3] 95/1 95/12 96/13 made [8] 18/7 18/9 24/20 28/1 36/1 52/6 75/18 115/7 Main [2] 16/2 16/5 make [9] 30/2 34/3 36/17 63/22 73/17 75/20 114/1 114/3 115/18 making [2] 30/4 90/21 male [2] 20/4 44/21 males [4] 20/9 20/11 44/22 44/24 management [1] 97/20 manner [2] 69/2 69/3 manual [8] 49/9 63/19 64/2 64/4 64/18 65/6 65/9 104/23 many [4] 23/24 47/8 47/11 81/12 March [6] 10/7 20/14 21/5 21/6 21/20 22/11 March 30 [1] 10/7 March 4 [1] 21/5 Marie [2] 95/4 95/10 marital [1] 27/2 mark [7] 12/16 13/21 36/21 60/5 84/3 84/11 84/12 marked [16] 9/25 12/13 13/20 33/1 36/20 60/4 63/25 86/17 86/18 87/9 88/10 90/13 92/11 93/12 99/9 99/10 marking [2] 10/3 93/13 marks [2] 39/1 84/5 Marnen [2] 1/21 2/5 married [1] 9/3 Mason [16] 52/19 59/1 59/1 67/20 80/2 80/10 80/15 80/20 80/21 88/6 95/22 95/23 111/22 113/1 113/2 114/2 mats [1] 24/6 matter [3] 46/18 48/6 66/20 mattered [1] 90/10 maximum [3] 20/4 26/1 41/18 may [69] 10/5 12/3 12/6 13/17 13/24 19/14 20/16 21/24 22/7 24/12 24/12 27/7 27/14 29/15 30/21 35/18 42/1 42/22 44/1 46/5 46/14 46/19 47/2 47/4 47/9

M	mistake [1] 88/22	nature [1] 105/8
may... [44] 50/15 50/16 52/13	mom [1] 28/6	near [4] 35/1 35/21 41/8 108/5
56/22 61/21 62/13 62/19 62/22	moment [3] 37/5 61/3 107/5	necessarily [1] 37/2
64/15 73/6 73/16 75/15 82/10	moment -- [1] 107/5	necessarily -- [1] 37/2
85/13 87/3 87/7 88/3 88/19 90/2	monitors [2] 40/3 40/4	need [6] 47/25 48/18 53/8 72/23
92/16 92/18 94/3 94/3 94/4 94/5	monitors -- [1] 40/3	109/13 110/14
94/14 94/15 94/16 95/9 95/21	Montgomery [3] 23/15 23/18	needed [1] 53/19
97/15 97/19 98/20 98/22 100/21	24/19	needs [2] 48/11 96/2
102/1 102/14 103/14 105/10	month [2] 5/4 30/14	neither [1] 68/21
108/14 108/17 109/20 110/7	months [8] 11/21 22/2 22/5 25/22	never [32] 12/15 19/8 20/2 27/25
115/4	50/12 50/15 50/17 50/19	31/15 38/1 41/22 44/22 46/2
May 14 [6] 12/3 22/7 30/21 62/13	more [14] 15/16 18/9 25/10 27/3	47/18 51/22 52/6 60/19 61/8
87/3 94/3	30/16 33/4 47/12 82/13 83/3	61/22 61/24 61/24 62/1 64/4
May 14th [5] 29/15 42/22 46/5	98/7 99/14 99/15 100/13 115/11	75/18 86/10 92/21 94/7 99/11
47/2 95/21	most [1] 93/22	99/14 99/19 102/23 104/6 104/6
May 15 [1] 94/3	mostly [1] 44/22	104/10 107/11 107/14
May 15th [1] 94/4	mother [6] 9/21 27/12 27/15	never -- [2] 52/6 62/1
May 17th [1] 98/22	29/24 31/8 50/9	new [2] 6/13 36/6
May 18 [1] 87/7	mother's [1] 9/23	news [2] 15/21 15/22
May 24 [1] 92/18	Motrin [1] 109/10	next [11] 10/18 15/6 16/17 20/13
May 30 [2] 21/24 24/12	move [7] 61/12 63/5 73/22 80/13	20/25 21/15 28/8 28/23 28/24
maybe [4] 12/10 44/19 44/19	81/22 103/25 110/3	38/5 63/17
61/10	moved [11] 14/10 16/7 18/12	nline [1] 72/17
McLaughlin [2] 1/12 1/21	18/24 19/5 20/5 20/11 24/11	no [115] 1/3 5/23 7/4 7/8 7/12
McMunn [2] 19/13 19/15	61/19 64/14 108/6	8/18 8/24 8/25 9/2 9/4 11/15
me [177]	moving [8] 14/10 18/4 18/21	12/2 13/12 14/4 15/3 19/6 20/23
me -- [2] 33/2 76/22	74/17 74/18 77/24 79/16 82/3	21/13 22/14 23/2 24/16 25/12
mean [30] 3/20 14/17 14/21 16/3	Mr [5] 2/5 38/9 52/5 52/15 90/7	27/17 28/19 29/10 29/17 31/4
17/3 27/1 34/6 34/20 35/10 40/3	Mr. [5] 52/4 59/1 80/10 83/11	31/16 32/9 33/17 35/12 37/19
52/21 55/20 59/24 68/6 68/7	97/11	38/2 42/1 42/8 42/9 42/9 42/18
68/7 70/17 70/22 70/25 73/1	Mr. Mason [1] 80/10	42/23 42/24 43/9 46/9 47/7
80/14 91/5 92/25 95/6 98/16	Mr. Mason -- [1] 59/1	47/11 50/3 50/6 50/16 50/25
99/5 99/17 100/7 101/18 107/10	Mr. Meltus [1] 52/4	51/22 51/25 52/18 52/20 54/19
meaning [1] 4/21	Mr. Sabousky [1] 97/11	55/13 57/2 58/4 58/5 59/22
means [8] 14/18 14/22 16/4 16/5	Mr. Struthers [1] 83/11	59/22 62/10 62/22 64/17 65/1
17/5 18/19 97/25 98/1	Ms [1] 31/21	65/2 65/4 68/15 68/20 69/6 69/8
means -- [2] 16/4 17/5	much [6] 48/14 54/21 69/5 91/2	69/11 69/13 69/18 75/7 75/14
meant [4] 20/20 25/20 37/1 44/12	91/13 115/12	77/21 78/1 78/6 79/8 79/15
medical [2] 8/14 35/17	multiple [1] 22/5	79/17 79/22 80/16 80/19 81/17
medication [4] 108/24 109/7	Muncy [6] 25/16 25/17 25/23 26/1	85/6 85/16 86/8 89/5 92/20 93/4
109/18 109/19	26/1 26/3	95/16 96/16 97/1 97/7 98/3
meeting [1] 26/7	murderer [1] 41/18	98/12 100/4 100/6 100/7 102/11
Meltus [4] 52/4 52/5 52/11 52/15	muscle [2] 85/11 109/14	102/14 102/16 103/21 104/22
member [7] 86/21 102/5 102/7	must [1] 67/23	105/25 106/3 106/6 106/8 106/24
102/12 115/5 115/7 115/8	my [88] 3/17 5/14 5/17 19/13	108/18 109/1 109/4 109/8 110/8
member -- [1] 115/7	20/2 24/16 26/5 27/11 27/11	112/19
Memo [1] 10/9	27/15 27/15 28/6 29/21 33/21	no appeal [1] 100/7
memory [4] 16/20 17/22 22/1	34/17 34/18 34/20 34/25 35/15	nobody [5] 80/24 82/9 98/6
25/1	36/15 36/18 42/9 43/17 43/20	104/12 104/23
men [1] 37/20	43/20 45/14 45/24 46/16 48/21	nod [1] 3/19
men's [4] 27/23 37/15 39/14 51/7	49/12 49/12 49/15 50/12 54/1	noise [1] 70/22
mention [1] 73/11	54/1 54/9 54/9 55/14 56/9 56/16	nor [1] 65/9
metal [3] 24/10 45/9 45/19	56/17 56/17 56/19 56/21 56/21	normal [4] 69/2 69/3 69/9 78/8
metal -- [1] 24/10	57/7 59/3 60/25 61/25 63/9 66/9	not [103] 3/20 4/3 5/4 6/2 11/24
Michael [4] 38/11 52/8 52/9 52/11	66/9 66/11 73/13 74/9 74/9	12/24 16/15 18/21 19/20 19/21
middle [2] 88/17 89/8	74/25 77/7 79/11 80/17 80/23	20/19 20/23 21/13 22/14 23/21
midnight [1] 94/17	81/3 81/3 82/1 82/18 82/20	25/8 25/9 25/17 25/25 26/18
might [3] 12/14 26/17 62/8	82/21 82/23 82/23 82/23 82/24	28/16 31/4 32/15 33/25 36/23
military [2] 16/10 88/23	83/3 83/8 83/10 83/14 83/15	37/2 39/16 47/3 47/11 47/21
mind [4] 3/7 86/13 86/14 106/11	84/6 85/23 94/8 98/5 98/18	49/3 49/19 49/21 53/9 53/15
minimum [1] 26/2	100/4 101/18 107/7 107/8 110/11	53/25 54/9 54/17 55/14 57/2
minute [4] 20/14 20/22 54/18	111/9 112/8	59/4 59/4 59/7 60/25 60/25
54/19	my -- [1] 34/17	61/10 61/17 61/18 62/6 63/8
minutes [8] 67/24 111/19 111/19	myself [6] 18/12 24/18 48/21	63/9 63/10 65/9 65/25 67/23
111/20 112/13 113/3 113/4	52/15 73/12 109/25	67/23 68/17 68/19 69/5 70/15
113/10	N	70/17 71/24 72/11 72/11 72/19
misconduct [9] 73/15 86/19 86/21	name [11] 3/7 9/13 9/23 32/8	72/24 73/22 74/19 75/17 76/9
88/18 89/20 90/8 90/17 93/4	38/11 52/5 79/10 86/3 86/3	79/11 80/3 80/10 85/15 86/1
93/8	92/15 95/4	86/14 87/11 87/13 87/15 87/16
misconducts [1] 22/14	names [1] 93/7	87/24 88/23 89/20 90/10 90/11
miss [1] 46/9	naturally [1] 48/17	90/15 92/6 92/20 93/5 93/7 94/6
		96/3 98/1 98/2 98/19 101/13

<p>N</p> <p>not... [7] 102/17 104/13 109/8 109/9 111/2 111/18 112/17 not -- [3] 25/8 39/16 72/11 Notary [1] 1/9 note [1] 94/23 nothing [8] 82/1 82/11 98/4 98/5 99/14 105/7 106/15 106/22 notice [7] 11/11 16/6 16/7 68/4 87/13 90/24 104/18 noticed [1] 61/2 notified [1] 34/24 November [2] 4/25 5/5 November 27 [1] 4/25 now [30] 6/14 6/18 6/20 7/21 13/21 15/21 15/22 33/4 41/6 55/6 55/11 62/1 62/5 63/15 70/3 70/17 71/11 73/25 87/17 87/24 87/25 90/14 92/12 93/13 96/15 99/21 103/11 106/9 106/23 108/11 nowhere [1] 14/19 number [5] 15/13 26/11 26/19 29/9 87/12 nurse [3] 85/2 85/22 85/25</p>	<p>okay [58] 3/11 3/25 4/2 4/4 4/7 6/15 11/11 11/15 13/1 15/18 16/16 17/19 23/19 26/13 27/8 31/24 32/18 33/5 33/24 37/1 37/20 39/5 42/1 45/4 46/25 47/17 48/5 50/11 50/22 61/10 62/4 63/20 63/21 64/22 66/7 68/10 72/13 72/22 73/19 73/22 78/23 79/9 82/12 85/21 87/6 87/23 91/4 92/8 93/9 94/2 100/17 100/20 101/3 101/17 101/24 102/25 106/23 110/14 okayed [2] 95/2 95/12 old [6] 7/21 50/12 50/15 50/17 50/19 61/9 on [167] on-call [2] 109/23 114/7 once [6] 39/11 59/6 61/14 71/8 100/11 110/19 one [85] 5/6 5/18 5/21 5/23 6/4 6/6 6/15 8/22 9/6 10/7 11/12 12/24 18/23 19/13 19/22 20/14 20/22 21/2 21/3 23/3 23/4 23/4 23/9 23/18 23/22 23/22 24/2 24/4 24/20 26/10 27/18 28/16 30/16 33/4 35/11 35/13 36/21 37/6 39/6 39/9 46/8 49/18 49/22 57/14 57/14 60/18 60/19 60/20 60/23 61/8 61/9 62/6 62/8 62/9 64/17 66/14 68/21 72/3 72/17 76/18 76/19 77/11 77/11 78/24 79/9 82/20 86/12 87/12 89/5 89/16 89/17 90/22 91/1 93/16 93/16 94/7 94/9 94/19 95/2 100/11 102/15 104/7 104/8 104/11 105/6 one -- [1] 6/6 ones [1] 87/20 only [27] 18/2 19/21 19/22 24/20 35/12 35/15 41/13 41/24 48/4 48/9 50/12 51/17 52/20 62/18 62/20 62/25 63/2 63/14 65/5 66/13 69/15 80/15 83/13 94/5 94/10 94/23 105/1 open [12] 34/18 34/25 39/16 39/17 42/25 43/2 44/12 58/2 58/8 74/22 75/9 75/13 opened [17] 43/3 43/11 44/17 57/24 58/5 58/6 74/22 75/7 75/9 75/10 75/25 77/7 79/24 83/9 110/16 110/19 112/7 opening [1] 113/18 option [1] 29/13 options [1] 22/16 or [87] 3/16 3/19 6/8 7/6 9/7 15/21 18/8 18/9 19/21 24/6 24/9 24/10 25/25 25/25 28/10 28/15 28/25 29/12 29/25 31/19 35/7 35/17 36/6 36/14 37/24 38/18 41/17 41/22 42/20 43/8 43/25 44/4 44/12 44/23 48/6 48/12 48/23 49/14 49/21 49/22 51/16 51/21 51/21 52/4 52/19 53/17 55/9 56/6 57/16 61/20 65/3 65/6 69/7 73/25 74/6 74/25 76/19 77/24 80/3 82/23 82/23 82/23 86/3 88/8 89/19 90/10 90/11 93/7 95/21 97/17 98/8 99/10 99/11 100/22 101/5 103/16 108/24 108/24 109/7 109/9 109/10 109/22 112/13 113/4 113/8 113/8 113/10</p>	<p>order [8] 18/12 20/11 34/18 89/19 89/23 91/2 91/10 91/15 orders [1] 71/1 ordinary [1] 41/11 originally [1] 107/3 originals [1] 87/22 other [42] 4/2 5/23 15/14 18/18 18/18 19/17 19/21 23/8 24/3 24/4 27/15 27/25 31/8 31/19 35/10 40/16 41/20 44/21 46/20 47/1 49/3 49/13 49/22 51/19 52/14 53/15 55/3 55/10 62/8 62/24 63/19 64/2 67/18 76/14 77/14 78/18 79/9 83/15 87/12 87/20 105/6 111/11 others [1] 96/2 otherwise [1] 98/8 our [5] 28/1 49/10 50/21 60/16 65/3 ourselves [1] 56/22 out [46] 3/13 3/20 7/2 10/16 12/10 12/25 18/9 19/8 20/5 25/7 25/10 27/9 28/21 32/23 36/14 43/16 43/19 43/19 43/20 45/14 48/21 51/1 52/15 60/19 60/23 64/14 72/20 74/4 74/6 75/5 80/6 80/7 82/24 83/20 88/3 93/6 95/15 96/20 98/20 99/7 99/9 99/15 102/10 106/22 108/6 112/8 outcome [1] 105/22 outside [9] 28/20 37/13 37/18 42/23 50/20 65/20 80/1 85/24 86/8 over [14] 15/6 34/5 39/14 45/4 52/18 52/25 53/1 55/13 63/20 82/17 83/9 84/2 91/21 109/12 over-the-counter [1] 109/18 overcrowded [1] 14/18 overheard [1] 94/18 oversight [1] 87/17 own [2] 36/9 49/12</p> <p>P</p> <p>P-A-S-C-O-R-E-L-L [1] 19/20 P.C [2] 1/12 1/21 p.m [8] 16/10 28/4 33/13 33/15 33/16 33/18 34/8 88/19 PA [2] 1/13 1/22 pad [1] 94/23 page [22] 10/9 11/3 11/6 11/12 11/15 12/2 12/17 21/16 26/19 33/8 37/15 64/7 65/12 93/17 93/19 93/21 97/1 100/14 100/18 103/25 104/14 107/6 pages [7] 10/7 10/13 11/7 11/12 90/23 90/25 93/15 pain [2] 81/9 113/8 paper [1] 101/16 paperwork [2] 26/5 98/24 paragraph [1] 64/12 parole [5] 5/23 6/11 6/12 6/15 6/20 part [1] 79/13 particular [1] 59/21 parties [1] 103/15 parts [1] 40/4 Pascorell [2] 19/14 19/19 pass [1] 36/11 passed [1] 42/8 past [3] 51/5 51/5 105/7 path [1] 51/4 patience [1] 115/12</p>
--	---	---

P		R
Patricia [1] 9/24	presence [1] 67/16	radio [2] 66/25 75/20
pay [2] 96/4 114/17	presently [2] 4/8 6/20	Radioed [1] 66/24
PENNSYLVANIA [2] 1/1 1/10	press [1] 44/13	raise [3] 78/2 78/7 78/13
people [15] 20/17 24/3 27/15	pretrial [1] 12/8	raised [1] 55/8
35/7 35/15 35/23 41/14 41/16	pretty [1] 50/18	ran [5] 50/24 51/1 51/10 51/23
49/13 52/13 60/3 69/15 74/20	printed [1] 90/19	52/21
75/23 76/9	prints [2] 84/18 84/19	rank [4] 51/15 51/20 91/11 91/16
performed [1] 42/15	prior [6] 4/18 4/19 6/8 14/2	ranking [1] 90/23
period [5] 17/17 43/12 62/15	60/14 61/16	rare [1] 32/5
62/18 110/9	prison [39] 12/4 12/11 12/18	rate [1] 26/10
permanently [1] 26/4	14/24 16/5 20/2 24/17 26/1	reaction [2] 82/25 83/2
permitted [2] 30/3 66/9	26/24 26/25 28/17 31/6 31/10	read [11] 33/17 61/24 61/25
person [7] 23/1 24/2 24/20 38/24	35/15 37/3 38/22 39/5 40/5	64/13 72/15 72/16 74/1 90/22
41/19 71/24 90/24	41/12 42/14 47/9 50/13 60/7	95/20 101/23 107/6
personal [2] 46/20 46/24	60/17 60/20 61/7 62/15 62/24	reading [1] 61/14
personally [4] 46/21 46/23 92/16	64/22 97/20 99/20 102/19 102/24	reads [1] 12/3
92/20	104/18 104/20 105/2 106/21	ready [5] 33/19 34/19 34/20 42/6
Personnel [1] 64/4	109/10 109/17	42/24
persons [1] 61/11	prisoners [1] 20/5	real [1] 110/12
phone [3] 25/4 30/2 30/4	privacy [1] 25/10	really [4] 31/25 54/10 55/25
photocopy [1] 36/22	private [3] 97/19 99/19 106/20	80/13
photographs [1] 85/12	privileged [2] 25/3 25/5	reason [11] 14/10 18/4 18/21
photos [1] 81/18	privileges [1] 25/6	20/6 20/7 54/4 54/4 93/4 94/5
physical [3] 8/11 8/19 113/8	Pro [1] 1/18	94/10 94/23
physically [3] 57/1 77/20 112/18	probably [6] 18/3 54/19 60/15	reasons [1] 35/11
picture [1] 36/15	74/24 83/22 88/22	recall [20] 15/19 23/21 30/10
pictures [2] 85/1 85/19	problem [4] 46/1 46/16 47/24	31/25 34/17 46/15 54/10 54/14
ple [3] 112/7 113/16 113/21	100/21	60/25 63/10 72/9 73/6 73/14
pinch [4] 56/11 81/12 83/14	problems [3] 46/24 47/1 86/11	76/8 80/2 80/12 84/4 105/21
84/12	procedure [3] 100/9 100/18	110/2 114/25
pinched [2] 81/18 82/21	106/13	receipt [2] 103/20 104/18
pinching [7] 56/9 80/23 81/5 81/6	procedures [7] 91/3 91/14 92/4	received [6] 98/14 98/16 98/17
82/14 107/25 108/7	100/20 102/20 107/9 107/13	98/17 98/18 103/24
Pltt [2] 8/10 8/17	proceeded [1] 70/16	received -- [1] 98/17
place [12] 28/7 28/12 29/2 30/8	process [2] 26/6 70/23	receiving [22] 24/5 34/18 35/1
36/24 49/7 54/10 63/14 74/11	processed [2] 35/23 36/1	35/21 35/23 39/15 39/20 39/20
75/3 93/5 110/20	processing [1] 8/7	40/18 43/1 43/17 45/4 45/19
placed [7] 22/17 22/19 24/15 25/4	produced [4] 12/19 13/25 14/3	51/3 59/2 82/17 83/1 83/8 95/17
25/5 107/11 110/24	87/15	108/6 108/8 110/15
places [1] 63/11	proposed [1] 103/17	recess [3] 63/23 73/20 86/15
Plaintiff [3] 1/2 1/17 12/3	provided [2] 86/2 102/4	recognize [3] 13/24 13/25 97/8
plea [1] 88/23	psych [1] 18/1	recollection [4] 43/17 46/16 60/25
plead [1] 6/8	Public [1] 1/9	91/7
please [5] 3/16 3/18 11/15 61/3	pull [4] 81/17 82/19 82/22 83/14	recollection -- [1] 60/25
100/15	pulled [6] 80/8 81/10 81/16 82/20	record [3] 25/24 34/3 103/19
pled [5] 6/10 6/13 6/14 90/10	82/21 82/24	recreation [2] 63/13 63/14
90/11	purpose [4] 3/12 64/15 79/20	recreational [1] 63/17
plenty [1] 87/25	88/5	redness [1] 85/20
plug [1] 35/18	push [3] 44/10 69/7 74/6	refer [2] 62/23 102/18
plugged [1] 35/19	pushed [9] 74/10 76/22 76/25	reference [2] 39/25 62/1
point [9] 17/11 19/13 30/11 35/14	77/2 77/4 77/14 83/7 108/7	referred [1] 109/23
55/22 66/9 73/4 92/23 111/15	115/9	referring [2] 92/5 99/21
points [2] 40/13 90/21	pushing [10] 53/11 56/9 76/22	refuse [3] 59/5 114/16 114/17
police [2] 34/5 96/3	79/17 80/24 81/19 81/21 81/22	refused [1] 91/10
policies [1] 102/19	82/2 107/22	refusing [4] 89/12 89/19 89/23
policy [1] 65/3	put [29] 14/18 20/5 20/6 20/11	91/2
polite [1] 79/7	24/2 24/6 24/18 24/19 26/4 35/8	regarding [1] 13/7
population [11] 17/13 21/13	43/20 45/14 48/20 48/21 49/15	regardless [1] 55/1
21/18 25/9 35/9 35/20 41/25	56/17 57/22 57/25 60/16 70/16	regular [2] 30/2 51/18
49/4 49/7 49/11 49/21	71/3 74/8 83/8 99/10 101/16	regularly [3] 27/14 29/21 86/9
port [3] 38/20 39/6 40/17	108/23 109/7 112/8 114/10	reiterated [2] 65/3 66/13
portion [1] 37/2	putting [3] 45/22 76/2 76/11	reiterating [1] 59/6
position [1] 80/13		related [1] 5/16
possible [1] 73/6	Q	relates [2] 87/3 107/16
possibly [1] 22/17	question [2] 3/14 12/6	relatives [1] 31/9
potentially [1] 101/25	questions [4] 3/13 3/17 32/16	release [10] 7/5 25/9 25/11 25/13
preceding [1] 11/8	115/12	36/6 37/15 37/20 39/14 51/7
prepared [6] 10/22 11/18 36/23	quiet [1] 78/11	67/20
93/21 93/23 115/16	quit [1] 82/14	relocating [1] 20/17
prerelease [1] 6/21	quite [1] 63/16	remain [1] 43/14

R	60/10 62/11 63/17 64/2 64/5 64/7 65/14 65/17 72/25 79/23 81/24 82/24 83/7 83/22 83/23 83/25 85/3 85/14 86/23 87/7 87/17 87/25 88/1 88/20 88/25 89/5 89/9 90/14 92/14 92/19 93/1 93/17 93/21 93/22 97/4 97/15 99/22 100/23 101/1 101/9 102/5 102/15 103/22 105/23 106/1 106/9 106/17 106/19 107/19 107/23 108/1 108/3 108/9 108/13 108/14 109/15 110/5 110/9 110/14 114/19 115/1 115/15 115/16 115/17 right -- [1] 86/23 right-hand [2] 33/9 37/14 right-hand -- [1] 37/14 rights [1] 106/5 rise [1] 5/21 risk [1] 35/19 roadway [1] 28/25 role [1] 103/2 RONALD [2] 1/4 103/5 room [26] 18/24 20/20 24/16 28/8 36/1 39/23 40/2 40/6 40/7 40/8 40/9 40/10 40/17 40/21 42/18 42/19 42/20 42/20 42/21 43/2 43/4 44/1 44/14 67/19 67/19 83/12 room -- [1] 40/9 roommate [3] 19/14 19/22 22/24 roommates [1] 19/21 rooms [1] 20/18 roughly [4] 56/6 56/7 57/1 57/1 roughly -- [1] 57/1 route [5] 41/9 50/25 55/1 75/18 103/23 routine [1] 34/20 rubbed [1] 84/21 rule [3] 61/19 61/21 89/20 rules [4] 59/18 59/21 59/22 60/1 run [2] 5/17 28/23 runs [1] 28/23 rushed [1] 55/2	68/13 sanction [1] 100/23 sat [1] 77/6 satisfaction [1] 104/2 Saturday [1] 28/1 Saturdays [3] 27/19 27/21 49/11 save [1] 73/12 saw [7] 14/2 26/13 64/4 85/3 108/13 109/21 110/7 say [44] 15/7 18/4 32/3 34/15 35/4 37/9 39/18 45/12 45/22 47/11 50/2 54/6 54/12 54/19 59/13 66/15 67/2 68/18 69/11 70/2 70/5 70/20 70/21 71/4 71/5 71/9 71/10 71/12 72/1 72/8 72/20 72/23 74/4 78/17 78/19 78/25 79/17 82/15 95/6 100/1 103/1 103/13 105/20 105/20 saying [7] 53/24 54/22 54/23 54/25 56/1 73/3 82/7 says [27] 11/12 14/15 16/5 16/8 18/18 18/20 20/14 21/5 25/14 26/19 33/11 37/15 59/20 59/24 72/18 93/3 95/19 96/11 97/17 98/12 98/14 98/25 100/20 101/4 104/1 104/14 106/19 scale [1] 37/2 schedule [1] 115/1 schematic [1] 37/1 school [2] 7/23 8/3 SCI [4] 4/19 4/21 25/16 25/17 scraped [3] 82/17 83/8 84/17 screaming [9] 53/22 54/7 54/8 55/6 76/8 76/12 78/17 78/19 92/2 Screening [1] 12/18 Se [1] 1/18 search [1] 42/15 second [21] 6/5 10/13 17/8 17/9 28/11 29/2 39/7 40/1 40/25 41/1 41/15 41/24 56/14 63/18 64/12 74/14 75/13 91/1 93/19 94/15 107/17 second-shift [1] 94/13 secretary [1] 38/18 section [9] 14/8 14/13 17/3 17/20 18/18 22/10 23/24 24/22 27/1 security [4] 20/4 26/1 26/2 41/18 see [42] 11/13 12/22 14/8 14/15 18/1 18/14 21/15 24/23 28/21 33/8 36/3 37/16 38/5 39/1 39/3 39/25 42/12 42/18 50/16 60/12 60/23 61/3 62/4 84/20 85/5 85/19 85/20 86/9 86/19 87/11 93/4 93/24 95/19 95/24 95/25 96/16 98/12 99/1 100/17 101/20 113/24 115/4 see if [1] 61/3 seeing [4] 47/14 50/4 50/8 61/15 seek [1] 103/14 seem [1] 79/20 seemed [1] 22/3 seems [1] 98/20 seen [19] 12/24 18/16 32/10 35/13 35/16 38/2 41/14 41/17 41/20 44/23 50/6 60/15 60/19 61/8 61/9 62/2 85/23 86/10 99/11 seen -- [1] 41/17 Senior [1] 8/3 Sennett [2] 1/12 1/21 sent [5] 11/8 61/15 61/16 99/7
S	S-A-B-O-U-S-K-Y [1] 38/13 S-A-L-L-Y [1] 38/21 Sabousky [16] 38/9 88/15 89/3 90/2 90/7 95/16 96/12 97/11 98/21 99/24 102/21 103/9 105/10 105/14 105/15 106/12 Sabousky -- [2] 95/16 105/10 safety [9] 49/2 49/12 49/25 54/1 54/4 59/11 66/3 112/24 112/25 said [62] 33/22 34/19 34/20 40/10 42/5 42/5 45/12 45/24 46/2 47/18 48/7 48/15 49/8 53/8 54/11 54/15 54/20 55/6 55/25 56/20 59/8 59/9 59/9 59/14 61/23 61/24 65/15 66/5 66/10 66/16 66/18 67/6 68/22 70/3 70/6 70/7 70/8 70/14 71/10 72/17 72/18 72/23 73/15 73/16 74/1 76/20 78/10 82/9 82/21 89/17 90/5 91/13 94/20 94/21 96/22 97/21 97/22 99/19 100/10 101/5 111/9 111/10 said -- [2] 42/5 73/15 sally [3] 38/20 39/6 40/17 same [10] 4/3 7/9 13/17 17/11 23/1 26/18 27/4 29/22 41/4	

S	sent... [1] 101/14 sentence [6] 5/16 5/17 5/18 6/12 12/2 33/17 sentenced [7] 5/8 5/11 11/20 11/25 13/8 13/10 13/11 sentences [1] 5/15 separate [4] 5/24 7/12 36/1 49/21 September [1] 8/15 sergeant [4] 51/21 95/1 95/12 96/12 serious [1] 105/8 served [1] 6/12 Service [1] 11/4 serving [1] 90/24 sessions [1] 21/2 set [1] 87/21 seven [4] 5/18 72/17 103/14 104/3 several [5] 5/12 81/13 81/14 81/15 83/15 Sharon [3] 19/14 19/17 19/18 she [232] She -- [1] 83/2 she'd [2] 85/23 96/4 she's [8] 32/4 50/6 71/24 77/18 78/10 80/25 89/7 96/2 Sheila [8] 23/3 29/6 34/11 45/1 106/23 110/22 112/16 113/10 Shelly [1] 32/12 Sheriff's [5] 33/20 34/6 34/7 85/13 95/24 shift [7] 45/17 54/2 94/12 94/15 94/16 95/3 95/9 shifts [1] 47/13 shock [1] 80/14 shooting [1] 8/25 short [6] 43/9 44/25 51/18 55/2 66/13 66/18 shorthanded [1] 48/10 shortly [1] 24/18 shortstaffedness [1] 49/8 should [7] 36/18 36/19 48/11 59/7 87/16 99/8 112/22 shoulder [3] 77/1 77/15 83/6 shoulders [1] 107/22 shouldn't [1] 112/6 shouting [2] 80/6 80/7 shove [1] 69/7 shoving [1] 108/3 show [8] 10/1 12/16 13/21 29/25 60/5 88/11 92/12 93/13 showed [1] 30/2 shower [1] 42/19 showing [2] 64/1 90/14 sic [4] 20/10 48/8 49/8 71/2 side [4] 33/9 40/16 78/11 86/19 sign [1] 34/22 signature [1] 93/24 signed [11] 11/1 11/4 88/15 90/23 90/24 92/13 92/18 96/5 96/12 96/21 97/12 signing [1] 93/5 Silent [1] 68/23 similar [1] 26/18 simply [3] 34/14 86/23 112/10 since [4] 5/1 7/2 8/4 31/9 single [4] 24/1 24/15 24/18 24/20 sitting [2] 77/7 79/24 situation [1] 71/2 situations [1] 96/3	slx [7] 10/6 30/8 50/12 50/15 50/19 72/17 74/25 slab [1] 24/10 slash [1] 39/1 slept [1] 24/10 slide [3] 44/8 44/9 44/11 slides [2] 44/4 44/6 sliding [3] 40/20 40/21 51/6 small [2] 27/1 27/1 smaller [1] 25/8 smiling [1] 96/7 SNYDER [3] 1/4 22/12 103/5 so [162] so -- [5] 18/2 20/4 48/9 48/10 52/24 some [20] 12/10 20/6 26/13 26/25 29/24 43/12 52/13 54/12 54/20 55/22 73/11 79/3 91/6 92/22 96/3 105/6 105/7 109/2 109/22 111/15 somebody [12] 42/20 43/25 44/3 44/19 44/19 49/5 58/5 83/9 94/20 96/21 97/2 102/9 somebody -- [1] 94/20 someone [14] 21/8 22/19 36/5 43/8 44/2 44/16 44/17 58/6 66/17 91/11 91/16 110/16 111/15 113/12 someone -- [1] 44/17 someplace [1] 76/20 something [19] 3/19 5/9 10/19 18/8 34/15 38/18 42/6 42/7 45/12 49/14 51/16 52/4 54/23 61/1 67/6 90/4 96/9 109/21 109/22 sometime [2] 13/14 75/2 sometimes [8] 24/2 24/5 63/8 63/8 63/9 63/9 92/8 92/9 somewhere [8] 7/7 32/10 36/19 41/7 41/7 52/3 52/10 75/6 somewhere -- [1] 7/7 Sonya [2] 1/9 1/25 sorry [6] 7/10 29/1 33/23 91/6 92/19 95/16 sounds [2] 3/21 24/14 sounds -- [1] 3/21 speak [6] 47/4 53/19 55/19 68/3 70/6 70/8 speaking [3] 27/10 53/1 70/1 specific [1] 100/22 specified [1] 89/21 spell [5] 4/10 19/15 23/16 31/1 31/22 spelled [2] 52/8 92/15 splint [1] 108/23 spoke [1] 94/21 spoken [1] 47/6 Springs [9] 4/19 4/20 4/24 5/3 7/3 11/18 25/17 25/25 26/2 Springs -- [1] 4/19 staff [5] 64/15 86/20 102/5 102/7 102/12 staff's [1] 100/22 staffed [6] 43/9 44/25 51/18 55/2 66/13 66/18 stairs [13] 29/12 29/13 36/4 39/25 41/6 41/7 41/8 41/13 41/14 41/22 41/23 43/25 58/20 stairwell [2] 41/20 76/10 stamped [1] 64/8 stand [1] 15/2 standard [8] 99/7 99/9 99/9 101/5	101/6 101/9 101/15 101/20 standing [7] 12/25 43/17 52/15 59/1 74/23 80/5 83/11 stands [3] 14/25 15/1 36/5 State [5] 4/21 5/15 24/17 25/18 26/24 statement [19] 30/15 30/16 32/22 32/23 33/18 33/21 33/22 33/25 34/4 47/15 50/9 50/10 52/3 52/6 71/4 72/23 74/1 81/11 85/22 statements [4] 73/8 85/2 88/8 88/9 STATES [1] 1/1 stating [1] 3/7 status [1] 27/2 stay [4] 25/7 25/7 26/1 67/12 stayed [2] 17/14 53/4 staying [1] 26/12 Step [4] 99/3 99/8 99/11 99/11 steps [2] 83/3 83/15 stiffened [1] 110/11 still [13] 6/21 6/22 27/20 43/22 53/23 58/2 66/5 81/25 83/3 90/11 91/15 94/17 110/6 stop [1] 75/15 stopped [3] 53/7 74/19 75/6 storage [3] 42/20 67/19 83/12 storeroom [8] 14/15 14/19 14/21 15/25 16/14 17/7 20/14 20/21 Street [4] 1/13 1/22 4/15 4/16 strike [1] 113/2 strip [6] 42/18 42/19 42/19 42/21 67/19 83/12 Struthers [10] 52/17 56/19 67/19 83/11 88/6 94/11 95/23 111/22 113/1 113/2 studies [2] 8/12 8/24 studying [1] 8/11 stuff [3] 26/7 26/25 90/19 subheading [1] 64/12 subject [3] 11/24 47/19 99/24 submitted [1] 36/18 such [2] 91/17 100/22 suddenly [1] 25/5 suicidal [2] 35/7 42/12 suicide [5] 18/1 18/5 20/7 22/16 35/13 supplied [1] 59/20 suppose [2] 78/2 78/4 supposed [7] 49/6 49/9 53/9 53/20 54/3 60/18 113/22 sure [21] 5/4 19/20 20/19 27/15 28/5 28/16 32/4 32/25 36/17 50/1 54/5 62/6 62/11 73/17 73/22 74/19 75/17 78/8 78/22 80/10 98/19 surface [1] 83/18 swing [1] 77/22 switched [1] 22/19 sworn [1] 3/2 system [2] 26/10 26/18
	T		
	take [38] 4/5 4/6 28/7 28/12 29/12 29/14 35/19 36/7 37/5 41/7 41/8 41/12 41/20 42/11 42/21 45/25 47/25 50/2 53/17 54/9 66/12 66/14 66/17 67/7 71/7 72/11 83/15 100/3 109/10 109/18 111/9 111/10 111/15 111/25 114/10 114/15 115/4 115/14		

130

dix

T		
take -- [1] 41/7	there's [41] 8/24 8/25 17/5 17/5	103/14 103/16 113/16 113/20
taken [15] 1/8 29/15 32/12 63/2	24/1 24/1 24/3 26/6 26/9 26/19	throughout [3] 62/24 73/4 76/11
63/23 73/20 85/12 85/13 86/15	28/8 29/17 36/3 36/4 36/13	throw [2] 82/25 83/16
96/11 97/17 97/19 106/15 109/20	36/13 36/15 38/3 38/15 38/24	thrown [1] 77/21
110/13	39/2 40/6 40/13 41/8 41/16	Thursday [1] 27/24
takes [2] 39/14 85/18	42/18 47/12 48/14 52/3 58/20	tier [3] 17/6 17/6 17/7
taking [3] 62/19 67/20 112/11	59/20 59/22 59/22 60/18 62/9	tiers [1] 17/5
talk [5] 4/3 58/23 70/14 72/24	65/2 65/4 69/18 88/4 100/7	time [82] 4/3 4/5 6/10 7/9 10/7
78/9	112/24	11/20 11/23 12/8 14/3 14/10
talked [4] 53/4 58/14 71/20 71/25	there's -- [1] 36/15	14/10 16/7 16/10 16/12 16/14
talking [10] 6/13 7/9 26/23 53/14	thereafter [1] 55/23	17/17 18/13 18/15 19/22 21/9
55/4 64/2 70/19 92/1 108/8	these [11] 12/24 16/6 26/13 39/1	22/7 22/15 22/18 23/9 23/21
110/10	45/15 53/20 54/1 59/7 60/24	23/22 23/22 24/8 24/17 27/16
Taylor [3] 32/12 32/12 89/7	76/9 87/11	29/6 29/22 30/8 32/15 32/19
Taylor -- [1] 32/12	they [148]	33/8 33/19 33/20 33/25 33/25
technician [1] 108/17	they -- [2] 85/9 113/23	34/4 34/15 41/13 42/15 43/12
Telemarketing [1] 7/1	they'll [1] 42/21	52/21 56/23 56/25 57/2 59/12
television [1] 38/4	they're [9] 44/25 48/10 59/5 59/9	60/19 62/15 62/18 62/18 62/20
tell [26] 3/17 29/25 47/23 49/19	98/1 98/2 99/6 100/10 113/22	62/25 63/2 63/2 76/8 78/24
49/24 53/6 53/8 58/25 61/20	they've [1] 35/25	81/16 81/17 82/20 85/9 85/12
70/3 71/3 71/11 71/14 72/16	thing [5] 4/2 26/23 27/5 48/9	85/18 88/19 90/6 95/13 96/3
79/13 94/5 94/22 98/2 102/10	91/17	100/21 101/25 103/5 107/17
105/23 106/1 106/4 109/2 111/8	things [5] 12/15 54/12 54/20	107/18 107/18 109/8 110/6 110/9
114/8 114/11	87/25 99/5	110/22 113/5 113/24
telling [5] 45/15 59/6 74/2 91/21	think [38] 4/6 5/4 10/1 14/14	time -- [2] 63/2 107/17
106/9	17/25 23/18 26/8 26/13 26/15	times [3] 41/19 74/25 81/12
tells [1] 59/15	32/23 33/3 33/13 42/5 44/17	title [6] 10/19 60/6 88/12 90/17
Temp [2] 7/16 7/17	44/18 52/8 58/20 61/3 62/9	93/14 102/23
tempers [1] 71/18	65/15 73/23 74/19 75/15 75/17	Titusville [1] 8/10
Tenth [2] 1/12 1/22	78/10 79/2 91/7 96/2 96/4 98/9	to -- [4] 11/11 44/7 66/18 101/20
term [2] 26/12 113/23	101/5 101/18 108/17 109/20	today [2] 20/21 74/2
terms [1] 78/11	112/22 114/18 115/11 115/13	together [2] 6/6 10/6
testified [1] 3/2	thinking [1] 18/7	told [32] 18/11 29/1 33/15 45/16
than [9] 15/16 26/24 30/16 39/19	third [5] 10/13 94/12 94/16 95/3	47/17 49/2 49/18 49/19 53/19
41/20 47/12 54/18 78/8 91/11	95/9	54/2 55/13 59/2 59/6 61/25
Thank [4] 44/12 87/19 95/19	this [105] 3/11 4/6 8/15 11/3	64/17 65/6 65/10 66/2 66/8
115/12	11/18 11/24 11/24 12/20 12/23	66/11 74/24 75/5 82/13 89/13
that [467]	12/24 13/22 13/24 15/21 17/2	90/7 91/8 104/12 104/23 105/10
that -- [8] 33/20 46/5 48/8 51/2	17/14 18/17 18/22 19/24 20/13	109/9 114/10 114/11
55/8 59/19 61/16 62/14	20/24 21/9 21/20 21/23 23/21	told -- [1] 91/8
that's [206]	24/11 24/21 26/25 27/1 32/23	tone [6] 48/1 48/5 48/8 48/16
the -- [5] 16/2 57/10 80/8 86/9	33/19 33/20 34/20 36/21 36/23	71/23 78/8
96/20	37/1 37/6 37/9 43/16 48/18	too [17] 3/24 12/15 17/9 35/10
theft [5] 5/12 5/13 5/13 5/25 6/1	49/16 50/13 52/15 56/23 59/14	42/17 43/6 54/21 63/3 67/23
their [7] 20/10 27/24 35/7 64/14	60/10 60/12 60/19 61/9 62/6	69/5 73/8 76/21 77/2 78/13
93/4 98/23 114/6	62/13 62/16 62/18 62/25 64/5	107/23 109/21 115/17
them [48] 6/6 18/11 20/5 23/3	64/18 64/24 65/2 65/3 65/4	took [20] 8/11 8/13 27/20 30/8
35/8 36/7 36/7 39/3 41/20 41/20	72/11 72/15 72/18 73/4 75/2	33/21 36/24 41/14 46/10 48/8
45/17 45/24 46/2 46/6 47/23	80/23 86/12 86/21 86/23 87/3	48/16 55/14 56/16 75/3 83/3
47/24 49/2 49/18 49/18 54/3	87/12 88/5 90/18 91/18 92/3	85/1 86/13 103/1 103/23 109/5
54/24 55/1 59/4 59/5 59/5 59/8	92/13 92/22 93/3 93/9 93/14	114/19
59/9 59/10 59/15 59/15 59/16	93/15 93/23 94/2 94/10 94/14	top [9] 11/11 14/6 17/5 33/7
60/16 66/5 78/2 84/20 85/10	94/15 96/16 96/17 96/17 97/20	37/15 83/9 83/20 98/11 100/17
87/12 89/14 89/16 90/22 94/6	97/25 98/20 98/22 99/7 99/12	torso [1] 82/23
111/10 111/23 111/25 112/11	99/18 102/10 105/1 105/3 105/4	tossed [2] 77/17 82/17
112/11 114/12 115/1	105/8 105/10 106/7 107/4 107/15	totaled [1] 6/6
then [56] 3/19 6/18 8/4 10/13	115/14	totes [1] 60/16
10/18 11/3 14/9 17/2 17/3 17/19	those [26] 5/14 5/16 5/21 11/12	touch [3] 57/6 68/24 82/21
18/17 19/17 20/13 20/24 21/20	12/15 19/21 31/12 35/11 35/12	touching [1] 76/20
24/3 24/21 24/23 25/14 28/11	35/15 39/4 39/4 39/9 39/11 42/7	toward [8] 40/13 42/23 45/18
34/14 38/5 38/15 39/7 43/1	47/18 47/21 47/22 64/15 85/12	51/8 58/19 73/5 83/3 100/17
50/22 51/7 54/8 55/13 58/12	87/20 89/21 99/5 106/4 113/10	towards [2] 39/14 51/7
66/8 68/10 70/15 72/25 75/6	113/14	trall [1] 106/13
77/18 79/23 82/22 83/8 83/16	though [3] 12/22 103/3 103/25	training [1] 96/2
87/10 87/12 88/11 90/14 90/23	thought [6] 12/14 26/3 76/20	transcript [1] 115/15
96/11 101/3 102/14 104/12	82/2 106/11 109/21	transferred [1] 24/22
104/14 107/18 108/5 110/20	three [6] 5/16 24/3 33/8 52/22	transition [1] 20/20
112/7 114/19 115/18	72/17 115/13	transitional [1] 7/13
therapy [2] 8/11 8/19	threw [1] 110/15	transport [2] 94/11 94/18
there [167]	through [17] 26/11 34/18 36/12	travel [1] 41/11
	38/23 38/24 39/6 39/7 39/11	traveled [1] 41/21
	40/17 40/19 40/20 51/6 70/12	treat [1] 56/25

T	74/21 80/25 usage [1] 36/5 use [12] 3/18 3/20 3/20 4/1 4/1 15/5 38/19 40/23 41/13 72/3 73/5 79/7 used [10] 35/25 41/14 46/25 60/16 73/16 74/3 78/23 78/25 95/22 102/23 using [1] 89/19 usual [1] 68/6 usually [1] 113/20	68/13 70/12 walked [12] 45/4 45/18 51/4 51/5 51/6 51/8 55/13 57/6 57/18 68/13 80/17 80/22 walking [4] 53/10 53/11 81/22 107/25 walls [1] 40/10 want [18] 3/11 4/5 10/1 47/19 48/17 49/13 71/16 71/17 71/18 72/10 72/12 95/25 96/9 96/9 107/7 114/18 115/17 115/18 wanted [7] 26/4 59/3 61/1 62/4 66/15 66/17 93/6 warden [24] 22/12 38/6 38/8 89/2 90/1 92/13 95/15 96/12 97/17 97/18 98/21 102/19 102/21 102/21 102/22 103/4 103/5 103/13 103/18 104/3 104/19 104/20 106/2 106/12 Warnick [3] 23/9 23/12 24/17 was [363] was -- [5] 71/2 73/23 80/13 96/8 96/8 wasn't [35] 14/22 15/12 22/15 22/15 25/12 27/16 45/17 48/11 49/5 51/20 52/9 52/18 52/25 53/20 54/3 55/25 56/13 63/16 65/2 70/19 71/1 71/1 72/22 78/15 81/22 94/19 99/16 100/2 100/13 105/21 107/17 108/21 108/22 109/14 109/24 watch [4] 18/2 18/5 20/7 35/13 watched [4] 83/14 83/14 83/15 83/16 water [1] 33/5 way [17] 27/2 29/24 51/2 56/8 56/15 58/21 62/10 65/2 65/4 65/5 68/13 75/16 80/24 81/7 81/8 107/18 109/2 we [41] 6/18 10/5 10/24 11/15 20/18 20/20 34/5 49/3 49/4 49/4 49/8 49/10 50/24 50/24 51/1 51/22 52/21 55/1 55/9 55/24 56/22 62/23 62/23 63/13 63/15 65/1 68/3 68/19 71/8 71/12 73/17 74/12 74/13 74/13 75/18 75/18 75/18 78/19 78/25 89/18 103/11 we'll [2] 4/2 36/21 we're [3] 6/13 26/23 66/18 we've [1] 4/2 wear [16] 45/15 45/24 46/2 46/6 47/18 49/20 54/24 59/3 59/5 59/8 59/9 59/15 59/15 59/16 65/23 66/5 wearing [12] 45/17 48/25 50/5 50/6 50/9 53/20 54/1 54/3 59/5 59/10 92/6 92/6 Wednesdays [2] 27/20 49/10 week [9] 16/21 16/25 17/24 18/3 18/14 27/17 27/18 30/1 31/9 weekly [1] 18/2 weeks [2] 19/25 30/8 well [19] 6/6 8/7 26/5 35/25 39/18 45/14 46/25 47/18 47/21 48/18 48/21 56/13 62/14 74/20 76/19 78/2 88/17 94/20 94/21 went [18] 17/20 18/18 20/14 21/21 22/10 25/3 25/16 25/17 34/25 43/1 43/24 52/16 58/19 74/12 74/13 75/11 84/24 85/7 were [154]
treatment [5] 102/19 102/21 102/23 103/13 104/3 trial [3] 6/9 6/10 41/18 tried [1] 48/16 trip [16] 56/12 56/13 56/14 56/16 68/15 68/20 68/24 69/7 69/9 69/12 69/13 73/12 75/2 75/21 81/12 82/5 trouble [2] 3/18 61/2 try [5] 3/17 3/20 4/1 4/1 62/14 trying [2] 73/12 83/20 Tuesday [1] 1/10 turn [3] 12/2 64/7 85/1 turned [2] 51/7 84/23 two [29] 5/18 5/24 8/11 8/13 9/10 17/5 19/21 21/2 22/2 24/4 24/5 35/12 39/2 39/11 69/15 69/20 71/19 72/17 76/7 76/19 78/17 81/1 85/3 90/21 90/22 90/24 93/15 111/23 111/25 Tylenol [5] 109/10 109/20 114/10 114/14 114/15 type [3] 27/4 98/6 100/2 types [3] 35/10 35/12 60/3 typical [2] 41/11 57/12	V vacated [4] 14/10 16/17 17/19 25/14 various [1] 40/4 VCP [3] 12/4 26/19 87/12 VCP-12 [1] 93/16 VCP-13 [1] 93/16 VCP-216 [1] 26/21 VCP-61 [2] 64/8 65/13 Venango [31] 8/13 8/22 12/4 12/11 12/18 14/24 16/5 18/22 20/2 26/6 26/15 26/24 31/5 31/9 35/14 37/3 38/22 39/5 41/12 42/14 47/9 59/19 60/7 60/17 60/20 61/6 62/15 64/22 97/19 105/2 109/16 verbal [1] 101/15 verbally [1] 103/16 verdict [2] 88/25 89/2 version [1] 3/14 very [20] 4/6 10/9 11/6 12/2 14/13 28/17 32/5 37/14 42/14 47/11 48/3 50/19 54/17 78/20 78/21 81/17 81/23 100/10 112/1 115/12 vestibule [3] 39/7 40/18 51/6 violated [1] 102/20 violation [6] 5/23 6/4 6/11 6/12 6/16 89/20 violation -- [1] 6/11 visit [23] 27/25 28/6 29/20 30/8 30/17 33/19 34/16 34/19 34/21 34/23 42/6 45/24 49/3 53/25 54/9 55/12 55/14 59/3 66/9 66/10 72/22 72/24 82/1 visitation [19] 27/10 27/18 27/24 28/1 28/7 28/8 28/11 29/11 30/18 46/14 59/24 62/19 63/1 63/9 63/15 65/23 67/7 74/24 111/11 visitations [1] 31/20 visited [2] 27/16 27/17 visiting [2] 29/2 49/6 visits [9] 27/14 29/21 31/8 31/12 46/6 46/8 49/10 49/11 49/20 voice [5] 48/1 48/5 55/8 71/23 78/7 volume [2] 78/11 78/13 vulgar [3] 73/16 73/24 74/3	
U uh-huh [5] 3/22 3/23 14/7 77/13 100/19 Uh-huh -- [1] 14/7 unacceptable [1] 93/7 unaware [2] 106/17 106/19 under [7] 14/13 15/6 18/21 64/12 81/25 84/10 100/20 underneath [2] 74/21 81/3 understaffed [1] 46/17 understaffness [1] 48/8 understand [8] 3/15 3/16 5/8 11/23 27/9 62/14 76/13 91/16 understand -- [1] 76/13 understood [1] 48/12 unit [3] 28/9 60/18 62/22 UNITED [3] 1/1 7/16 7/17 units [1] 64/15 University [2] 8/10 8/12 unlocked [3] 43/11 43/14 43/23 unlocking [1] 112/10 unnecessary [1] 95/23 unordinary [1] 12/5 until [9] 21/24 60/23 68/19 81/17 83/9 96/17 98/21 107/19 115/4 unusual [1] 68/5 up [41] 20/9 21/15 25/7 26/11 28/11 29/25 30/2 30/5 34/14 34/22 36/4 39/25 41/18 41/20 41/22 42/8 45/25 47/25 50/2 52/14 55/2 58/21 70/4 71/8 72/18 73/14 74/25 75/18 75/18 77/18 77/19 80/6 80/8 81/3 84/10 84/17 89/16 94/21 110/12 113/2 115/9 upon [3] 60/16 85/8 115/3 upper [5] 17/9 21/3 37/14 81/2 84/9 upset [3] 68/1 112/2 113/8 upstairs [4] 36/4 41/8 46/10 71/12 upwardly [1] 78/2 us [11] 20/11 20/17 27/25 34/21 52/23 55/17 63/22 71/19 74/21	W W-A-R-N-I-C-K [1] 23/13 waist [4] 39/18 39/18 39/19 57/4 waist -- [1] 39/18 wait [1] 67/22 waited [1] 67/11 waiting [2] 74/21 76/9 waive [1] 115/17 walk [10] 29/12 34/14 38/24 39/11 40/9 51/2 51/2 58/17	

W	77/21 96/7 99/10 99/10 111/25 113/21 115/4 wigs [1] 103/11 will [15] 8/15 60/9 64/14 89/12 97/18 97/19 101/4 102/4 102/7 102/12 102/18 103/19 104/4 104/17 106/20 window [1] 28/20 Winters [3] 95/17 96/23 96/24 wit [2] 95/22 95/24 with -- [3] 37/11 76/25 101/11 within [10] 14/24 20/2 101/25 102/17 103/14 103/20 103/24 104/3 113/2 113/4 without [2] 61/19 96/4 witness [6] 10/4 11/16 33/6 64/9 89/7 100/16 witnessed [1] 56/19 witnesses [2] 88/1 88/7 woman [2] 80/25 95/3 woman -- [1] 80/25 women [9] 14/23 14/25 15/2 17/13 20/3 20/6 20/10 27/19 44/23 won't [1] 60/9 word [4] 47/1 78/23 90/9 101/20 words [9] 3/18 3/20 4/1 4/1 47/21 47/23 72/9 79/1 79/3 work [12] 7/5 25/9 25/11 25/13 36/6 37/15 37/20 39/14 44/24 51/7 67/20 98/4 work-release [1] 25/2 worker [1] 52/2 working [3] 6/23 48/4 104/17 works [1] 95/3 would [94] 3/7 5/5 11/7 11/11 11/17 15/13 16/15 17/2 17/6 17/7 17/9 18/10 18/24 18/25 26/15 27/12 28/9 28/10 28/11 28/12 28/23 28/24 29/25 32/5 32/12 32/22 33/8 33/15 36/16 37/9 38/9 38/9 39/13 39/15 39/18 40/17 40/20 42/25 43/19 43/24 43/25 45/25 47/7 48/7 48/14 48/17 50/16 50/17 52/3 53/12 54/10 54/19 56/20 57/7 57/8 59/2 62/10 63/11 63/15 65/2 65/4 65/5 65/5 66/11 70/22 76/7 76/25 78/25 79/17 83/13 83/19 86/13 88/7 89/17 90/5 90/11 94/7 94/8 94/16 94/16 98/8 98/9 98/9 99/10 99/19 100/3 100/14 103/1 104/20 106/14 106/15 107/14 111/10 115/14 would -- [1] 17/2 wouldn't [13] 46/23 47/11 50/14 57/17 70/23 72/1 78/19 79/7 90/10 95/25 96/5 107/12 109/16 wrist [2] 76/7 110/3 wrists [2] 84/7 84/15 write [1] 96/10 writing [1] 62/4 written [9] 21/8 89/16 94/22 96/9 102/2 102/12 103/17 103/19 106/14 wrong [10] 46/25 66/10 72/25 73/3 73/4 76/11 82/1 93/5 109/9 109/15 wrote [2] 73/14 96/10	X x-ray [2] 108/17 109/6 x-rayed [1] 108/16 x-raying [1] 108/19 Y yanked [2] 74/9 84/20 yanking [4] 75/8 77/17 79/18 107/23 yeah [30] 23/15 24/15 25/24 28/3 39/1 41/13 42/25 44/3 44/10 48/21 53/17 53/17 54/14 55/5 67/25 74/18 75/12 76/22 76/25 76/25 77/16 78/25 83/19 84/6 84/25 85/20 89/15 95/8 109/13 109/23 year [7] 5/6 7/25 8/12 8/16 8/22 13/4 13/17 years [5] 5/18 7/21 8/11 8/13 60/15 yelling [2] 55/10 113/12 yes [194] Yes -- [1] 76/19 yet [2] 20/19 85/16 you [722] you -- [2] 45/1 113/1 you'll [5] 42/18 66/18 66/19 86/19 87/11 you're [31] 7/9 7/21 17/11 19/8 25/9 26/12 28/16 42/12 49/19 49/21 53/8 53/25 55/4 55/12 55/14 59/14 62/1 64/10 64/20 65/14 70/8 74/2 85/20 87/17 88/5 90/8 90/21 92/1 92/19 99/21 108/8 You're -- [1] 87/17 you've [3] 38/1 41/22 74/24 young [2] 50/18 50/19 your [114] 3/7 3/9 3/14 3/19 6/16 6/18 7/15 9/21 9/23 10/1 10/11 10/16 13/5 16/20 17/22 19/9 19/12 22/1 24/25 25/8 25/24 26/10 26/12 27/2 27/2 27/10 27/12 27/12 29/8 29/24 31/8 32/22 33/5 34/15 34/15 34/19 34/21 39/13 40/19 42/6 42/12 42/23 43/14 43/22 45/18 48/5 48/23 49/20 49/25 50/4 50/9 53/25 54/16 55/12 56/2 56/11 57/4 57/8 57/16 59/11 59/24 60/18 60/22 61/1 61/25 65/15 66/2 67/12 67/14 67/16 70/23 72/23 76/7 77/6 77/23 77/24 78/7 79/2 82/6 83/21 84/5 84/7 84/9 84/15 84/15 88/7 88/23 90/15 90/18 91/24 93/3 93/24 95/19 95/20 97/6 98/17 98/22 100/8 106/11 107/4 107/10 107/19 107/19 107/22 107/25 108/5 108/6 110/3 110/20 110/24 111/2 111/12 114/24 115/12 your -- [1] 84/15 yours [1] 101/6 yourself [2] 87/18 109/2
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**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

JENNIFER ANN FEDOREK,

Plaintiff

vs.

RONALD SNYDER and KEOKE CRAFT

Defendants

Civil Action No. 05-186 Erie

Jury Trial Demanded

**VERIFICATION OF KEOKEE CRAFT IN SUPPORT OF DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT**

On this 24th day of October, 2007 I, Keokee Craft, the undersigned, state that the following facts are true and correct based on my personal knowledge, subject to the penalties of perjury under the laws of the United States of America.

1. My date of birth is July 28, 1971.
2. I am presently employed by the Venango County Prison ("VCP"), a facility that secures individuals either awaiting adjudication of their charges, or are serving a sentence in the prison.
3. I have been employed by the VCP as a corrections officer from 2002 to the present.
4. On May 14, 2005 I was assigned to work the night shift, also known as "C-Shift". CO Barb Andres and I were handling inmate visitation. CO Andres would greet visitors and situate them in the visitation room while I would prepare the inmates and escort them to the visitation room.
5. As a VCP corrections officer I have read and understood the policies and procedures contained in the Venango County Prison Employee Personnel Manual, a true and

correct copy is attached hereto as Fedorek Deposition Exhibit G. On page 47, under the heading entitled "Use of Force and Restraints", subheading "Restraints", the following language is stated in pertinent part:

"Inmates in locked housing will be in restraints when moved out of their cells for any purpose;"

6. A "lockdown inmate" is an inmate who requires special accommodation because they cannot interact with other inmates without great difficulty or danger to themselves or other inmates. Examples of such an inmate include the following: one inmate is enemies with another; the inmate is placed on suicide watch; the inmate has special medical needs.

7. At approximately 6:00 p.m. I began preparing Ms. Fedorek for her visitation. Being short-staffed I had to physically enter the control room to activate the controls to release her cell door. I activated the door controls and Ms. Fedorek stepped out as I came back out from the control room and through the door to the receiving desk/holding cell area in H Block.

8. I ordered Ms. Fedorek to place her hands out in order to handcuff her. Ms. Fedorek began to protest, stating that another corrections officer had told her that she did not have to wear handcuffs when being transported in the prison and especially during visitations. I explained to Ms. Fedorek the handcuff procedure. Ms. Fedorek then became loud and boisterous stating that her daughter is not going to see her with handcuffs on. As I placed the handcuffs on her, I tried to reassure Ms. Fedorek that I would remove them when we reached the visitation room.

9. We began our trip toward the elevator that would take us to the level of the prison the visitation room. Ms. Fedorek became more agitated as we approached the elevator. She continued to defy me and insisted that she did not have to wear the handcuffs.

Again, I attempted to reassure her that she would not have to wear the handcuffs in front of her daughter but she would not listen. Her verbal assault escalated with Ms. Fedorek screaming and yelling "Don't fucking talk to me!" At that point I was not going to let a disruptive inmate into the visitation area and told Ms. Fedorek that she was not going to have her visit.

10. On our way to the elevator we ran into CO Douglas Buchanan, the officer in charge for C-Shift that day. Ms. Fedorek began to plead with CO Buchanan about the handcuffs and what she had allegedly heard from another corrections officer. He reiterated the handcuff policy to Ms. Fedorek and I told him that because she was disobeying my orders she was not going to get her visit. We then proceeded to escort Ms. Fedorek back to H Block.

11. Ms. Fedorek and I entered H Block where the receiving desk was located. CO Buchanan had entered the receiving desk from the control room so that he was behind the desk looking directly at our location. He stood there trying to calm Ms. Fedorek down and reach some semblance of understanding with her. Finally, he told her that if she wanted to have her visit she was going to have to wear the handcuffs. She begrudgingly complied with his directive.

12. I then stated to CO Buchanan that if Ms. Fedorek showed any sign of disobedience or disorderly conduct, I would revoke her visit again. Although Ms. Fedorek stood there nostrils flared and teeth clenched, it appeared to me that everyone was in agreement with that compromise. We then began our second trip to the elevator.

13. As we exited H Block I attempted to explain to Ms. Fedorek that I intended to take the handcuffs off before she saw her daughter. This set her off again. I had just pressed the call button for the elevator. The doors opened and Ms. Fedorek entered it. Again, she was using profanities and yelling at me. I then ordered her out of the elevator and informed her that she had lost her visit.

14. Ms. Fedorek escalated her verbal assault screaming that she was going to get her visit. After arguing back and forth, I called for backup. CO Matthew Mason was the first to respond. We were able to remove Ms. Fedorek from the elevator without the use of physical force. We then proceeded to escort her back to her holding cell.

15. Normally a corrections officer is positioned slightly to the left and within arms length of an inmate when escorting them. You do not put a hand on the inmate unless it is absolutely necessary. Because Ms. Fedorek was agitated and resisting, CO Mason and I were on either side of Ms. Fedorek with a palm-open, light but firm hold on both of Ms. Fedorek's arms around the triceps area right above the elbow. At no time did I or CO Mason pinch Ms. Fedorek's arms, push Ms. Fedorek in the direction we were travelling or pull Ms. Fedorek along by the chain of her handcuffs. The only time we would increase our grip would be when Ms. Fedorek was struggling to break free.

16. We entered the receiving area and CO Mason departed from us to open the holding cell door in the control room. Ms. Fedorek began to jerk away from me and was screaming and yelling. In order to subdue her, I placed one hand on her arm and another on her back gripping her shirt. I then guided, not pushed, Ms. Fedorek against the wall in between her holding cell and the adjacent cell. I did not shove or throw Ms. Fedorek against the wall. This was a controlled move that essentially was designed to immobilize rather than hurt Ms. Fedorek.

17. The problem now was that in order for the holding cell door to completely open, Ms. Fedorek would have to be moved from where I had immobilized her. Ms. Fedorek continued to struggle with me. I guided her to the receiving desk where I braced her against it in a standing position by continuing the hold I had on her arm and back but placing my knee in between her legs and resting it on the riser of the receiving desk.

18. These events happened within a matter of seconds. Ms. Fedorek was not in the restraint move for very long before the holding cell door opened and I guided Ms. Fedorek into the holding cell. Because she continued to resist and scream, I left the handcuffs on until she calmed down. In order to diffuse the situation and because I had other inmate visits to complete, I left H Block to continue my duties.

19. Before I left I told either CO Mason or CO Buchanan that I would remove the handcuffs once Ms. Fedorek had calmed down. By the time I returned, the handcuffs were already off Ms. Fedorek. After that I had no further contact with Ms. Fedorek the remainder of the evening.


Keokee Craft

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

JENNIFER ANN FEDOREK,

Plaintiff

vs.

RONALD SNYDER and KEOKE CRAFT

Defendants

Civil Action No. 05-186 Erie

Jury Trial Demanded

**VERIFICATION OF MICHAEL SABOUSKY IN SUPPORT OF DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT**

On this 23 day of October, 2007 I, Michael Sabousky, the undersigned, state that the following facts are true and correct based on my personal knowledge, subject to the penalties of perjury under the laws of the United States of America.

1. My date of birth is January 21, 1948.
2. I am presently employed by the Venango County Prison ("VCP"), a facility that secures individuals either awaiting adjudication of their charges, or are serving a sentence in the prison.
3. I have been employed by the VCP as a corrections officer from 1990 to the present. I am a Deputy Warden at VCP and also serve as the Deputy Warden of Treatment for the prison.
4. In my capacity as Deputy Warden of Treatment I oversee inmate rehabilitative treatment programs such as Alcoholics Anonymous, Fatherhood, Early Headstart, etc. I also coordinate with the Drug and Alcohol Department of Venango County and Turning Point, a program that grants inmates who have earned the privilege to leave the confines of the prison to complete a treatment program.

5. In my capacity as Deputy Warden I oversee and process inmate grievances. As a VCP corrections officer and deputy warden I have read and understand the inmate grievance procedures contained in the Venango County Prison Inmate Handbook, a true and correct copy is attached hereto as Fedorek Deposition Exhibit F. Pages 17 through 19 of the Inmate Handbook contain a detailed description of the grievance procedure and the enumerated steps an inmate must complete.

6. Upon entry into VCP each inmate is given various documents which they instructed to read. Among those documents is the VCP Inmate Handbook. The handbook is presented in a tote, which contains, among other things, bed linens, a care kit, and other personal items. The tote is stored in an inmate's holding cell.

7. Inmates are instructed to read and become familiar with VCP policies and procedures. The following language is contained on page 3 of the Inmate Handbook:

"The purpose of this handbook is to provide you with the general rules and regulations that you are expected to follow while in the Venango County Prison (VCP). It is your responsibility to learn and abide by all rules and regulations of the Prison."

8. Additional copies of the Inmate Handbook can be found in the booking area and television room, these are common areas of the prison.

9. If an inmate fails to read the Inmate Handbook or loses their copy, a "staff member will instruct on the basic requirements for completing the form if the inmate so requests." (Fedorek Deposition Exhibit F, p. 18).

10. On May 17, 2005 I received Jennifer Fedorek's grievance which was signed by her and dated May 15, 2005. The grievance was co-signed by CO Winters and Sgt. McKenzie. The grievance was inappropriately marked "standard" by Ms. Fedorek. On May 27,

2005 I returned to Ms. Fedorek a copy of an Inmate Grievance Response, which was signed and dated by myself, a true and correct copy of both documents is attached hereto as Fedorek Deposition Exhibit M.

11. I review every inmate grievance and classify it as either informal, standard or emergency. I then answer the grievance and send copies of my response to the inmate and the Warden. It is not the inmate's prerogative to classify the grievance according to what he or she thinks it should be classified; this is indicated on the inmate grievance form and Ms. Fedorek's 5-14-05 grievance, which states at the top of the page "Do not write in this Block."

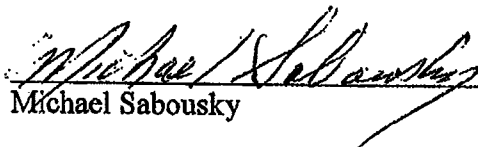
12. Every Inmate Grievance Response that is returned to the inmate has three boxes marked "Step One", "Step Two" and "Step Three". These boxes indicate which step of the grievance process the inmate and the VCP are currently addressing. In addition, this form contains the following language:

"If you are not satisfied with the action taken at Steps One or Two, you may appeal the decision. Step Three is with the Warden and his decision is final."

13. A typical grievance is classified either as informal or standard. Only in rare circumstances is a grievance classified as emergency. An informal grievance is usually where an inmate is unhappy with something that happened within the prison and seeks a minor remedy (i.e., an inmate is harassing the aggrieved inmate). A standard grievance contains a more detailed account containing allegations more serious in nature and a request for a very specific remedy.

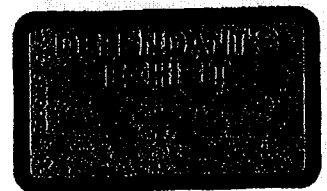
14. With respect to Ms. Fedorek's grievance, the incident description's casual tone and a lack of a specific remedy led me to classify her grievance as informal as opposed to standard.

15. The language used in my Inmate Grievance Response to Ms. Fedorek stating in part that "any action that maybe taken will be the private concerns of the Venango County Prison and its management" meant that if there was any discipline to be implemented against CO Craft, Ms. Fedorek would not be privy to how that would have been dispensed, since it is not VCP policy to inform inmates on how corrections officer discipline is handled.


Michael Sabousky

VENANGO COUNTY PRISON

INMATE HANDBOOK



VCP 000000177

INTRODUCTION

Rights under this Directive	3
Admittance Procedure	3
Crimes Code Violations	3
Daily Activities	4
Addressing Staff Personnel	4
Following orders	5
Inmate Movement outside of the Cell Block	5
Official Notices	5
General Rules	5
Standards of Behavior	9
Misconduct Reports	11

GENERAL INFORMATION

Ball and Bondsman	12
Classification	12
Clothing	13
Commissary	13
Contraband	14
Drug Testing	14
Educational opportunities	15
Fire / Emergency Drills	15
Indigent Inmates	16
Inmate Grievance Procedure	16
Inmate Request forms	17
Laundry	19
Law Library	19
Legal Representation	19
Mail	19
	20

Medical Services.....	22
Money.....	23
Personal Hygiene.....	24
Personal Property.....	24
P.R.A.B. – Pre-Release Advisory Board.....	24
Recreation.....	24
Reimbursement / Restitution.....	25
Religious Activities.....	26
Riots, Hostages, and Disruptive Behavior.....	26
Searches.....	26
Smoking.....	27
Telephone.....	27
Television.....	28
Visitation.....	28
Work Release and Community Service.....	29

INTRODUCTION

The purpose of this handbook is to provide you with the general rules and regulations that you are expected to follow while in the Venango County Prison (VCP). It is your responsibility to learn and abide by all rules and regulations of the Prison.

You are expected to conduct yourself in an orderly and mature manner, with due respect for the rights of others. You are reminded that situations may arise which are not covered by specific rules and regulations. If you are unsure of what to do, you are urged to use good judgment and/or request the advice of a Corrections Officer.

Failure to comply with any rule or regulation will subject you to disciplinary action.

In an extended emergency situation or extended disruption of normal institution operations, any or all of the rules and regulations pertaining to the Venango County Prison may be suspended by the Warden or his designee for a specific period of time, upon the approval of the Venango County Prison Board.

VCP rules and regulations are subject to change without notice.

Rights under this Directive

This handbook sets out policy and procedure. It does not create rights in any person nor should it be interpreted or applied in such a manner as to abridge the rights of any individual. The handbook should be interpreted to have sufficient flexibility so as to be consistent with law, and to permit the accomplishment of the purpose of the directives and policies of the Venango County Prison.

Admittance Procedure

When you first arrive at the Venango County Prison you will receive this handbook, a stamped envelope, writing paper, and be given the opportunity to make a collect phone call to advise a relative or friend of your situation.

Your personal property and money will be turned over to the Booking Officer upon your arrival. These items will be kept safely for you during your stay. You will be issued a receipt for these items, retain this receipt and check it for accuracy.

You are strongly encouraged to send home any items that you feel are of value.

You will be permitted to keep the following items with you:

- prostheses devices (as approved by the Medical Department)
- wedding band – plain
- religious materials
- religious beads-rosary beads

- religious medal (sized less than a half-dollar) attached to a chain no longer than 20 inches long
- acceptable photographs – No Polaroids

All other property will be placed in secured Property for safekeeping.

The Prison will not store excess property. It must be picked up within two weeks, or it will be mailed out at your expense. Only one attempt will be made to mail it out. If the property is returned, it will be donated to a charitable organization.

The money you came in with will be entered into an account for you. You may purchase items as described in the Commissary section.

All persons committed to the Venango County Prison will undergo the following procedure:

1. Booking - Personal information will be obtained from you.
2. Personal property inventoried and a receipt issued.
3. Search and shower
4. Issued Prison clothes and bedding
5. Housed in a segregation cell until seen by the Prison medical staff and classified by the Inmate Classification Committee.
6. You will be given a physical and a medical history will be taken. Part of the process involves testing for Tuberculosis. This is a mandatory State health requirement. If you refuse, you will be kept in segregation/quarantine until you comply with this requirement.

Crimes Code Violations

All laws of the Commonwealth of Pennsylvania are just as applicable to life within the Prison as they are to life on the street, and criminal prosecution can be instituted against any inmate who chooses to violate any criminal statute.

Daily Activities

- A. Meals will be served at the following times:
1. Breakfast - 0730 hrs (7:30 a.m.)
 2. Lunch - 1200 hrs (12:00 p.m.)
 3. Supper - 1700 hrs (5:00 p.m.)
- B. Minimum and Medium Security Lock Up
1. 1030 hours
 2. 1430 hours
 3. 2245 hours
- C. Maximum Security Lock Up
1. 1000 hours
 2. 1400 hours
 3. 2100 hours

Addressing Staff Personnel

Inmates should approach all staff personnel with respect and courtesy. Staff personnel should be addressed by their title (Warden, Deputy Warden, Doctor, etc.) or by "Mister" and if their last name is known (Mister Smith, etc.) or by "Sir" if their correct title or last name is not known. For women, the appropriate Mrs., Miss, Ms, or Ma'am should be used.

Following orders

When you receive an order you must promptly and properly do as you are instructed. If you have received conflicting orders from different staff members you must advise the person giving you the last order, of the conflicting orders you have received.

Always obey the last order given.

If you feel an order is unjust, you must obey the order when it is given. You may make a formal or informal complaint to a higher ranking official at a later time.

Inmate Movement outside of the Cell Block

1. All inmates shall walk in single file and along the right side of the hallway in the direction they are walking.
2. There shall be absolutely no talking or horseplay by inmates while an inmate movement is in progress.

Official Notices

You are responsible for keeping yourself informed of all institutional rules, regulations and notices that will be posted. All notices and signs prepared by officials of the Prison are considered regulations and must be strictly followed. Inmates are not permitted to post notices of any kind without the written permission from the Warden or Chief Deputy Warden.

General Rules

- Tampering with, removal of, damage to, destruction of, blocking of, or in any way making inoperable any lock, door, locking device, allied equipment, or any fire or safety equipment is prohibited.
- Absence from an assigned location without prior knowledge and permission from an officer is not permitted.
- Any sexual behavior involving another person whether voluntary or involuntary is prohibited. Any such conduct will be treated as misconduct and/or violation of the law.
- Cutting or grooming of another inmate's hair is only permitted by the Prison's licensed barber.
- Inmates may not congregate in nor hold any group meetings without proper approval of the staff. Inmates may not form organizations without approval of the Warden.

- Possession or circulation of petitions without the written permission of the Warden is prohibited.
- Practicing of martial arts, such as judo, karate, or other arts of self-defense and drilling or marching shall not be permitted.

Cell Block Rules

You are responsible for the contents of your cell, and you will be held accountable for any contraband (unauthorized items) found on your person, among your belongings, or in said area. If you share housing with others, any contraband found in common areas shall be considered in your possession whether it belongs to you or not. Therefore, you should inspect your cell prior to leaving or immediately upon entering to make sure that you have complied with all housing area regulations and that no contraband item(s) are in your cell.

- Beds must be made when you get up and your cell must be clean and orderly at all times.
- Blankets are provided for your sleeping comfort and must be stored on your bed and not used for any other purpose.
- Complete Prison uniforms, consisting of the uniform pants, must be pulled up to waist level, and shirt must be worn between the hours 0800-1700 Monday through Friday. After hours, you may wear a white T-shirt or prison shirt.
- Any unauthorized or altered clothing found in your possession will be confiscated.
- Loud talking, whistling, singing or any other form of boisterous behavior is not permitted.
- Passing of items other than newspapers between cells or cellblocks is forbidden.
- Alterations to your cell are not allowed.
- Unless authorized, nothing is to be affixed to the bars, walls, ceilings, ventilators, lights, windows, or cell doors.
- After each meal, the floors will be cleaned and all inmates will be locked down until the floors are clean and dry.
- Inmates cell doors will be locked at all times and inmates will have the option at the top of each hour to either enter or leave their cell. If you are out of your cell prior to the signal for moving, you may enter your cell, but will remain in your cell until the next signal to move is given.
Example: If you need to use the toilet, you may request to enter your cell, but will remain in your cell until the next signal to move.
- There will not be any loitering on the stairway.

Under no circumstances or for any reasons may you enter the cell of another inmate.

You are responsible for the cleanliness of your cell and you must keep the toilet, washbasin and all other fixtures neat and clean at all times.

Needed repairs to cell fixtures or equipment shall be reported to the block officer.